



HFTP®

Hospitality Financial and
Technology Professionals

EU General Data Protection Regulation (GDPR)

Compliance Tools for the Hospitality Industry

Hospitality Organization Flow Charts

This document is a set of flow charts illustrating data flow scenarios, involved parties providing hospitality services, steps of the guest journey and more. Four scenarios are presented: independent hotel, independent hotel with third party agreement, branded hotel and branded hotel with independent control.

The flow charts were developed by the HFTP Hospitality DPO/GDPR Task Force. The task force is a group of 23 hospitality industry experts tasked with developing hospitality-specific guidelines to assist with preparation for GDPR compliance. The definitions presented in the following flow charts are based on analysis of the GDPR regulations made by the HFTP GDPR/DPO Task Force. All parties may not be in agreement and it is understood that the charts are designed as a guideline to be adapted to suit individual situations.

Learn more about HFTP and the HFTP GDPR/DPO Advisory council at www.hftp.org.

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INTRODUCTION

The HFTP GDPR Task force has prepared a set of flow charts that contain the following in a graphical layout:

- Descriptions of data flow scenarios
- Identification of involved parties providing hospitality services
- Steps of the guest journey and the related data processing implications -including consent
- **Roles as controller or processor of the entity providing the service**
- Software applications and systems used to gather and process the data
- Identification of agreements required
- List of policies to be reviewed or implemented and applied in the service agreements

Specific flow charts have been prepared for the main types of organizations that provide hospitality services as follows:

- **Scenario 1:** Independent Hotel
- **Scenario 2:** Independent Hotel with 3rd Party Agreement
- **Scenario 3:** Branded Hotel — applicable also to managed or franchised hotels
- **Scenario 4:** Branded Hotel (Independent Control) — applicable also to managed or franchised hotels

The intentions of the charts are to provide a guide to hospitality companies:

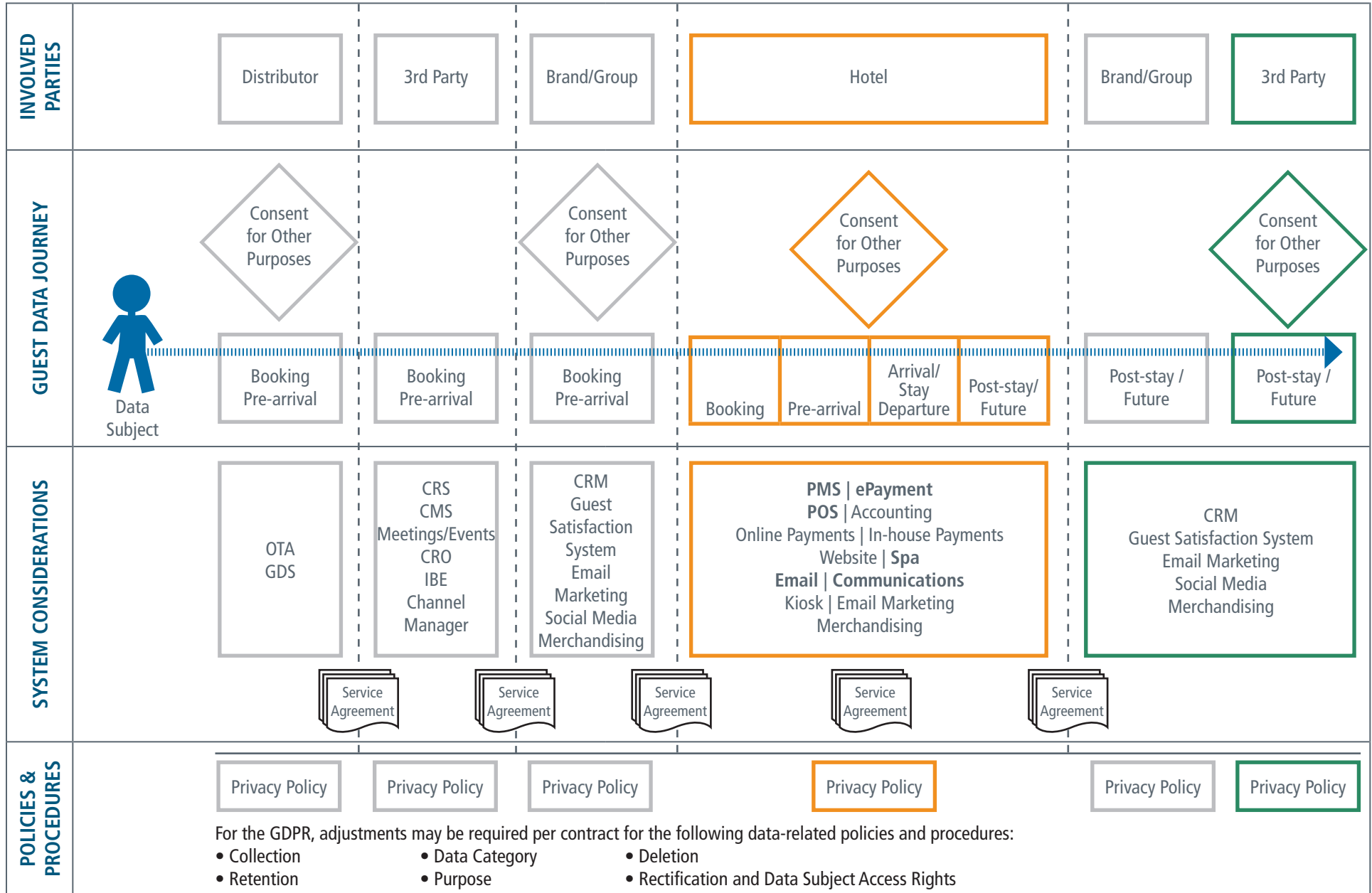
- To show how GDPR affects the management of client and/or guest personal data, depending on their status as Controller or Processor
- To establish internal policies and procedures
- To inform guests and clients through comprehensive Privacy Policies
- To review and adapt the service agreements with 3rd parties to those policies

NOTE 1: The charts focus on the management of the personal data of guests and clients and do not cover the application of GDPR to personnel & staff. This is because GDPR excludes unified application to employees' personal data, these being covered by national regulations in force that may vary by country. Also, the charts do not cover the management of potential employees, applicant data, rosters for temporary workers, etc.

NOTE 2: The charts do not address the export of guest data outside EU.

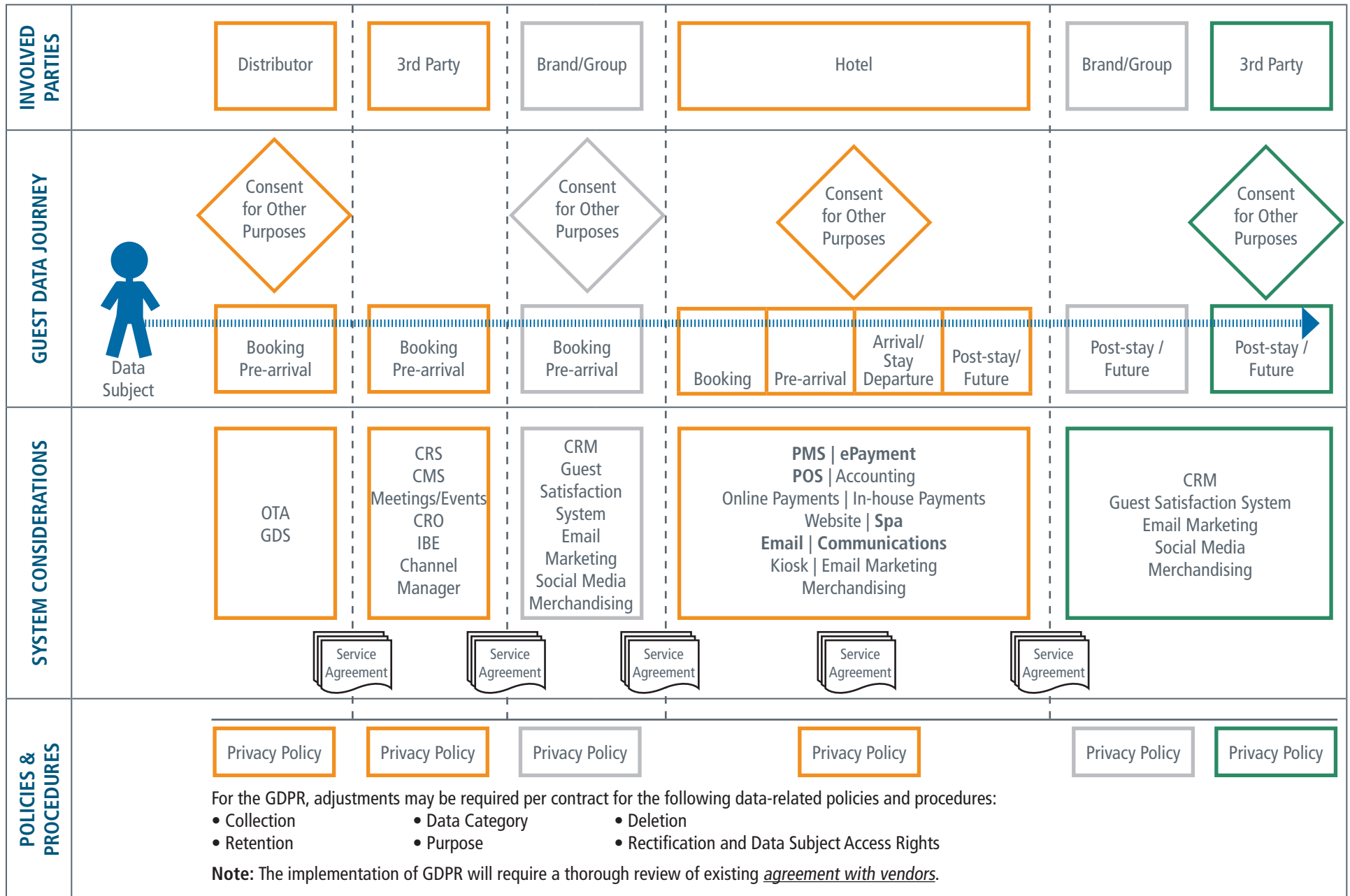
SCENARIO 1 INDEPENDENT HOTEL

This chart represents a data flow as may exist for an independent hotel that possesses an on-property PMS and does not interface or integrate with third party sales agreements (i.e. OTAs, GDS, etc.). However, the hotel may interface with one or more third party for post-stay monitoring.



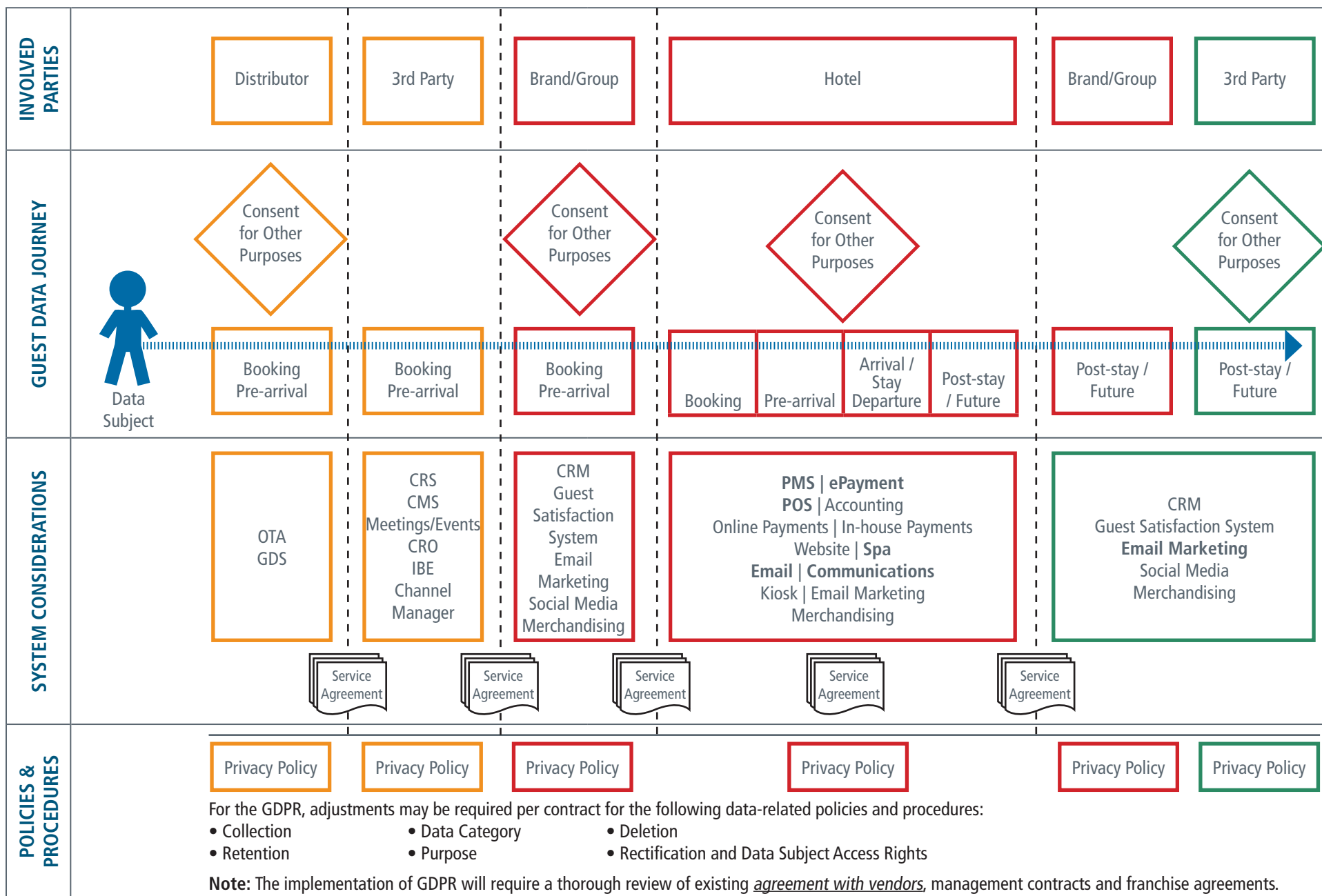
SCENARIO 2 INDEPENDENT HOTEL & 3RD PARTY AGREEMENT

This chart represents a data flow as may exist for an independent hotel that has 3rd party sales agreements (i.e. OTA, GDS, etc.) with entities that may process data for their own purposes. The hotel may interface with one or more 3rd parties for post-stay monitoring. Sales distributors and 3rd parties are considered by default to be **Controllers** unless otherwise proven.



SCENARIO 3 BRANDED HOTEL

This chart represents a data flow as may exist for a branded hotel strictly following data process management standards as set by the brand for unified purposes. The hotel and/or brand may interface with one or more 3rd parties for post-stay monitoring. Sales distributors and 3rd parties are considered by default to be **Controllers** unless otherwise proven.



SCENARIO 4
BRANDED HOTEL
 (INDEPENDENT CONTROL)

This chart represents a data flow as may exist for a branded hotel not strictly following data process management standards as set by the brand. The hotel and/or brand may interface with one or more 3rd parties for post-stay monitoring. Sales distributors and 3rd parties are considered by default to be **Controllers** unless otherwise proven.

