Privacy Notice – The Diplomat Collection

Last updated: 2026-11-23.

This notice explains how Hotel Diplomat AB handles personal data at its three hotels in The Diplomat Collection – Hotel Diplomat, Villa Dagmar and Villa Dahlia – about guests, loyalty members, restaurant and conference customers, and people who contact us.

1. Who is responsible for your data

Hotel Diplomat AB, Strandvägen 7C, 114 56 Stockholm, Sweden, corporate ID no. 556119-0751, is the controller of your personal data.

Questions or requests about your data: **privacy@thediplomatcollection.com**.

Hotel Diplomat AB owns and operates all three hotels, which use common booking and guest systems. Your guest profile is therefore available to staff at all three hotels, so we can recognise you wherever you stay with us.

2. What data we collect

Category	Examples
Identity and contact	Name, address, phone number, email, nationality, date of birth
Booking and stay	Dates, room type, rate, number of guests, travel companions, booking channel
Preferences and requests	Pillow type, celebrations, late check-out, dietary preferences, notes from previous stays
Payment	Payment method and transaction details. Card numbers are handled by our payment provider; we do not store full card numbers.
Loyalty membership	Membership number, level, points, stay history
Communication	Emails, phone and chat messages, reviews and survey answers
Technical	IP address and device data when you use our website, guest app or in-room services
Security	CCTV footage from public areas; key card logs

Where it comes from: mainly from you. We also receive data from booking platforms (e.g. Booking.com, Expedia), travel agents, your employer or the person who made the booking, and partner programmes (e.g. Preferred Hotels & Resorts, American Express Fine Hotels + Resorts).

You do not have to give us your data, but we cannot complete a booking without your name and contact details.

3. Why we use your data and our legal basis

Purpose	Legal basis (GDPR)
Handle your booking, stay, restaurant or conference booking, and payment	Contract (Art. 6(1)(b))
Contact you before, during and after your stay about your booking	Contract (Art. 6(1)(b))
Keep accounting records and meet other legal obligations incl. guest registration for foreign guests	Legal obligation (Art. 6(1)(c))
Remember your preferences to personalise future stays	Legitimate interest (Art. 6(1)(f))
Analyse reviews, surveys and feedback to improve our service	Legitimate interest (Art. 6(1)(f))
Manage your loyalty membership	Contract (Art. 6(1)(b))
Send newsletters and offers by email or SMS	Consent, or legitimate interest for existing guests where Swedish marketing law allows. You can opt out at any time.
Protect guests, staff and property (CCTV, key cards) and prevent fraud	Legitimate interest (Art. 6(1)(f))
Establish or defend legal claims, e.g. complaints	Legitimate interest (Art. 6(1)(f))

Where we rely on legitimate interest, we have weighed our interest against your privacy. You can ask us for more information about that assessment.

We do not make decisions about you based solely on automated processing.

4. Allergies, dietary and accessibility needs

Information about an allergy, a medical diet or an accessibility need is health data. We only use it with your explicit consent (Art. 9(2)(a)), and we record the need, not a diagnosis (e.g. “nut allergy”, “accessible room”).

- **For your current stay:** when you give us this information in your booking, or tell our staff, you consent to us sharing it with the staff who need it to prepare your stay safely, such as the kitchen, restaurant, housekeeping, reception and night staff (including in case of evacuation). It is deleted after check-out.
- **For future stays:** we only save it in your guest profile if you ask us to, for example by ticking the box in the booking form or telling us at check-in or check-out. It is then available to staff at all three of our hotels and kept as long as your profile, at most 5 years after your last stay.

You can withdraw either consent at any time, and we will delete the information. In an emergency where you cannot respond, we may share what is needed to protect your health (Art. 9(2)(c)).

We do not use this information for marketing or statistics, and we do not include it in data processed by AI tools.

5. Who we share your data with

We never sell your personal data. We share it only when needed:

- **Service providers acting on our behalf** (processors), under data processing agreements: property management and booking systems, channel manager, CRM and guest communication, guest surveys, restaurant booking and POS, payment processing, IT, email and AI tools.
- **Staff at our three hotels** (Hotel Diplomat, Villa Dagmar and Villa Dahlia), all operated by Hotel Diplomat AB, who share booking and guest systems.
- **Independent partners** who have their own privacy policies, e.g. booking platforms, travel agents and loyalty programmes you have chosen to use.
- **Authorities**, e.g. the police, when required by law.

6. Transfers outside the EU/EEA

Some providers, or their support teams, are located outside the EU/EEA, mainly in the United States and the United Kingdom. We then use the European Commission's Standard Contractual Clauses, an adequacy decision (such as the EU–US Data Privacy Framework for certified companies), or Binding Corporate Rules. Contact us for a copy of the safeguards.

7. How long we keep your data

Data	Retention
Booking and stay data	Kept in your guest profile, 5 years after your last stay
Accounting records (invoices, receipts)	7 years, as required by the Swedish Bookkeeping Act
Guest profile and preferences	5 years after your last stay, so we can welcome you back. Then deleted or anonymised. You can ask us to delete it earlier.
Loyalty membership	While you are a member, and 5 years after your last stay or activity
Emails and phone messages	365 days, unless linked to a booking or complaint
Complaints and claims	2 years after the matter is closed
CCTV footage	30 days, unless needed to investigate an incident
Marketing lists	Until you unsubscribe

8. Your rights

You have the right to:

- **Access** the data we hold about you and receive a copy.
- **Rectification** of incorrect or incomplete data.

- **Erasure**, unless we must keep the data, for example for accounting.
- **Restriction** of processing in certain cases.
- **Data portability** for data you gave us under a contract or consent.
- **Object** to processing based on legitimate interest, and **always** to direct marketing.
- **Withdraw consent** at any time, without affecting earlier processing.

Send your request to privacy@thediplomatcollection.com. We may ask you to verify your identity. We reply within one month.

9. Complaints

If you are unhappy with how we handle your data, please contact us first. You can also complain to the Swedish Authority for Privacy Protection (IMY), www.imy.se, or the authority in your country of residence.

10. AI tools

We use AI tools, including Claude from Anthropic, to summarise reviews and prepare internal reports such as arrival lists. Only the data needed is used, and staff review the results. No decisions about you are made by AI alone.

11. CCTV and website

Public areas of the hotel are monitored by CCTV for security; signs show where. Our websites use cookies. Cookies that are not strictly necessary, such as analytics and marketing, are only set if you accept them in the cookie banner, and you can change your choice at any time.

12. Changes to this notice

We update this notice when our processing changes. The latest version is always on our website, with the date at the top.