

# Who controls the technology behind a UK hospitality business?

How much this sector depends on technology suppliers it cannot fully control — and where that matters most.

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## The big picture

### HIGH EXPOSURE

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For a typical UK hospitality operator — a restaurant or pub group, or a hotel — six of the nine building blocks score High exposure. They cluster around the systems that actually take the money and run the floor: the till (EPOS), the payments rail, and the staff log-in. Payments is the sharpest dependency, because almost every card transaction settles over the US-controlled Visa and Mastercard schemes, which no acquirer can route around. The sector's saving grace is that genuine UK-controlled options exist at the till and the booking desk, which is not true of the cloud, the office software or the card schemes.

We looked at the everyday layers of technology a UK hospitality or leisure business relies on, from the cloud it runs on to the systems that define the sector. A supplier owned in the United States can be compelled to hand over data under US law — the CLOUD Act<sup>[1]</sup>, and the surveillance powers in Section 702 of the Foreign Intelligence Surveillance Act<sup>[2]</sup> — even when that data is stored in Britain; a British supplier answers only to UK law. We scored each building block on four things — how few the suppliers are, whose laws they answer to, how hard they are to switch, and how essential they are.

## Where the exposure sits



## Who controls each layer

The building blocks this sector relies on, coloured by who ultimately controls each one: ■ US-controlled ■ Mixed / other

<p><b>Cloud &amp; compute</b> Amazon Web Services / Microsoft Azure / Google Cloud</p>	US
<p><b>Office &amp; productivity</b> Microsoft 365 / Google Workspace</p>	US
<p><b>EPOS / point of sale</b> Toast / Lightspeed / TISSL (US) — UK: Zonal, ICRTouch, Tevalis, Comtrex</p>	US
<p><b>Table booking &amp; reservations</b> SevenRooms / OpenTable / TheFork (US) — UK: ResDiary, Collins (DesignMyNight)</p>	US
<p><b>Hotel property management system (PMS)</b> Mews (Netherlands) / Oracle Opera (US) — UK: Guestline, Newbook</p>	Mixed
<p><b>Workforce &amp; back-office</b> Fourth / Harri (US) / Access Hospitality (UK) — UK/EU: Bizimply (Ireland), Nory (Ireland)</p>	US

## Data & BI

EPOS-native reporting / Airship, Yumpingo (UK)

US

## Identity & log-in

Microsoft Entra / Okta (staff); EPOS/PMS-native staff log-in

US

## Payments (card-acquiring & card schemes)

Dojo / Worldpay / Stripe / SumUp over Visa & Mastercard — UK/EU: Dojo, SumUp, Teya

US

*Genuinely UK-controlled options in our data: EPOS Zonal, ICRTouch, Tevalis, Comtrex; restaurant booking ResDiary, Collins (DesignMyNight); hotel/leisure PMS Guestline; workforce/back-office Access Hospitality (plus Trail, Slerp for operations and ordering); marketing Airship, Yumpingo; order/pay-at-table Vita Mojo, storekit; payments acquiring Yoello (plus UK-based Dojo and Teya widely used); procurement Erudus, growyze. EU-controlled (a rung below the US incumbents on jurisdiction): Mews (NL) for hotel PMS; Bizimply and Nory (IE) and Flow Learning by Mapal (FR) for workforce; Easylis (FR) and Nutritics (IE) for procurement; SumUp (LU) for payments. None removes the US Visa/Mastercard card-scheme dependency, and several widely-used names are foreign-controlled (Planday is NZ-controlled, Fourth and Harri US, Glofox and TheFork US) — check ownership before relying on any option.*

## What this means, in plain terms

**The defining risk: the till and the card rail decide whether you can trade.** Two layers decide whether a hospitality business can take a single order: the EPOS (the till) and the payments rail. Both are heavily foreign-controlled. The leading EPOS names for fast-growth operators are Toast and TISSL (US) and Lightspeed (Canadian), and almost every card transaction — whether tapped at the table or taken online — settles over Visa and Mastercard, both US card schemes. An operator can change its card acquirer, but it cannot route around the schemes themselves. That is the sharpest, least substitutable dependency on the board, and it is why payments carries both the highest criticality and the highest confidentiality concern <sup>[3]</sup>.

**Payments is the sensitive layer — and it has two faces.** Card payment processes cardholder data and the full record of who ate or stayed, when, and how much they spent — commercially sensitive and regulated under PCI DSS (the Payment Card Industry Data Security Standard). Even where the acquirer is European on paper, the schemes that authorise every transaction are American, so the confidentiality and the continuity exposure both run back to US-controlled rails. Unlike a law firm, a hospitality operator is genuinely card-payment-dependent: if authorisation stops, the doors might as well be shut <sup>[3]</sup>.

**There are real UK options at the till and the booking desk.** This is where hospitality differs from cloud or office software, where no British option exists at scale. Our data holds genuinely UK-controlled EPOS vendors — Zonal, ICRTouch, Tevalis and Comtrex — and UK-controlled restaurant booking systems — ResDiary and Collins (DesignMyNight). For hotels, Mews is Netherlands-controlled (EU law, a rung better than the US incumbents) and Guestline is UK. None of this removes the Visa/Mastercard scheme dependency, and the largest cloud-native EPOS and reservation brands remain American — but at the floor-level systems the operator has a real, sovereignty-relevant choice that most sectors lack.

**Concentration: the EPOS often pulls payments, bookings and reporting with it.** A modern cloud EPOS is rarely just a till. An operator on Toast or Lightspeed typically takes the EPOS, its built-in payments, its reporting and sometimes its online ordering and reservations as a single bundle — so one foreign-controlled vendor sits under the till, the checkout, the data and the front-of-house at once. That correlates the failures: one outage, account action or legal order touches most of the trading floor together. Beneath all of it, the EPOS, the PMS, the booking system and the payment processor mostly run on AWS, Azure or Google Cloud — so the substrate concentrates back onto the same three US clouds (our data confirms Fourth, Glofox, TeamUp and others host on AWS).

**The kill-switch test: the till and the card rail fail in hours.** If a foreign provider restricted service, the EPOS and the payment rail would fail within hours — cards stop clearing and the till cannot ring up a sale, with no manual workaround at any scale. A hotel's PMS failing means no check-in, no room allocation and no rate management. Booking systems and reporting have a little more runway, and head-office office software more still. Replacing an EPOS estate or migrating a PMS full of guest history takes months. That gap — fails in hours, fixed in months — is what makes the till, the payment rail and (for hotels) the PMS the board-level priority.

## If a supplier pulled the plug, how fast would it hurt?

SPEED OF IMPACT	LAYER	WHAT HAPPENS
Hours	Payments (card-acquiring & card schemes)	Card authorisation stops; card-present and online sales halt. An acquirer can be replaced in weeks–months, but the Visa/Mastercard scheme dependency cannot be routed around at all.
Hours	EPOS / point of sale	The till cannot take an order; cloud EPOS goes dark and offline modes are limited. Re-fitting an EPOS estate across sites is a multi-month project.

<b>Hours</b>	Hotel property management system (PMS)	No check-in, room allocation or rate management; a hotel cannot operate. Migrating a PMS full of guest and booking history is one of the deepest moves on the board.
<b>Hours–days</b>	Identity & log-in	Staff and head office locked out of systems; fast failure, but more recoverable than the trading layers.
<b>Days</b>	Table booking & reservations	Covers and pre-bookings disrupted; phone and walk-in fallback gives limited runway, online bookings stop.
<b>Days–weeks</b>	Workforce & back-office	Rotas, payroll and stock degrade; manual processes buy some time but pay-runs and labour scheduling are time-critical.

## What organisations can do about this

BUILDING BLOCK	PRACTICAL STEPS
<b>EPOS / point of sale</b>	At the next till refresh, weigh genuinely UK-controlled options against the US incumbents. Our data shows UK-controlled Zonal, ICRTouch, Tevalis and Comtrex; for hotels and leisure, UK Guestline. Choosing a UK EPOS lowers the jurisdiction towards 1 and breaks the bundle that pulls payments and data onto a single foreign vendor — but an estate-wide swap is slow, so the hardware-refresh cycle is the moment to choose.
<b>Payments</b>	An acquirer can be diversified or moved — UK-based Dojo and Teya, or Luxembourg-controlled SumUp, lower the processor's jurisdiction a rung. But no acquirer removes the Visa/Mastercard scheme dependency; account-to-account and open-banking payment routes (some run through UK-controlled processors) are the only genuine reduction of card-scheme reliance, and adoption in hospitality is still early. Treat the scheme dependency as accept-and-monitor.
<b>Booking, reservations &amp; PMS</b>	For restaurant bookings, UK-controlled ResDiary and Collins (DesignMyNight) are credible alternatives to US SevenRooms, OpenTable and TheFork. For hotels, Mews (Netherlands) sits a rung below the US incumbents on jurisdiction and Guestline is UK-controlled. Preferring these at renewal lowers jurisdiction without an estate-wide hardware change — among the cheaper sovereignty wins available to the sector.

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## Workforce & back-office

Fourth and Harri are US-controlled; UK-controlled Access Hospitality and Ireland-controlled Bizimply and Nory are EU/UK-law alternatives for rotas, payroll and stock. These hold staff payroll and personal data, so the jurisdiction question matters even though the layer is less time-critical than the till. Prefer a UK/EU-controlled supplier at renewal.

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## Cloud, identity, data residency & contracts

Head-office cloud and staff log-in have no British option at scale — UK and European choices such as OVHcloud, Scaleway, IONOS and the self-hosted open-source log-in Keycloak reduce reliance on a single US provider. Where a US platform is unavoidable, insist on UK/EU data residency, UK/EU-law contracting and clear sub-processor disclosure. This lowers the practical blast radius but does not remove US legal reach (the CLOUD Act — the Clarifying Lawful Overseas Use of Data Act 2018 — can compel a US company to hand over data it controls, wherever stored). Document the residual and monitor it.

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## Sources

1. US CLOUD Act 2018 (18 U.S.C. 2713) - compels US-incorporated providers to produce data in their custody wherever in the world it is stored. <https://www.govinfo.gov/content/pkg/USCODE-2018-title18/html/USCODE-2018-title18-partI-chap121-sec2713.htm>
2. US Foreign Intelligence Surveillance Act, Section 702 (50 U.S.C. 1881a) - a US directed-surveillance authority. <https://www.govinfo.gov/app/details/USCODE-2021-title50/USCODE-2021-title50-chap36-subchapVI-sec1881a>
3. Vendor ownership and hosting - taken from company filings, public registries (including UK Companies House) and suppliers' own documentation, compiled in the Information Matters UK vendor sovereignty database.

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**How we did this.** We scored each technology layer on four things — supplier concentration, whose laws they answer to, how hard they are to switch, and how essential they are — using the IM Sovereignty Framework and our UK vendor database. Control and hosting facts come from primary sources; the harder-to-quantify judgments are our reasoned view of a typical organisation. Scores are bands, not exact measurements. Full evidence record available on request.

This research consists of the opinions of the Information Matters team — human and AI — and should not be considered statements of fact.

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