

PRIVACY POLICY

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We take your privacy seriously and we respect your privacy and data protection rights. This privacy notice aims to give you information on how we collect and process your personal data through your use of our website and our services, including any data you may provide through our website and our services when you sign up to receive news, offers, promotions and updates, book a table with us, take part in a competition, complete a Customer care survey, provide feedback, use our Wi-Fi, or otherwise purchase a product or service (such as buying a gift card).

Please take time to read this privacy notice in full, together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, to ensure that you understand and are happy with how we collect and process your personal data. This privacy notice supplements the other notices and is not intended to override them.

We sometimes collect and process **Sensitive Data (such as your health information, race, ethnicity)** See sections 7 of this Privacy Policy for details. Except where set out to the contrary in another of our privacy notices (for example, our Candidate Privacy Notice for job applications), we do not collect or process any information about **criminal convictions and offences**.

1. Controller

Almond Family Pubs is made up of 5 pubs and a head office, details of which can be found at www.almond-pubs.co.uk. This privacy notice is issued by Almond Family Pubs with its registered office at the 63 Hulme Hall road, Cheadle Hulme, SK8 6JZ) on behalf of the Group so when we refer to "we", "us" or "our" in this privacy notice, we are referring to the relevant company within the Group that is responsible for processing your data. Almond Family Pubs head office is the controller and is responsible for our website and this service.

We have appointed a data protection officer (**DPO**), who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details below:

2. Contact Details

Our full details are:

Data Protection Officer

Marketing@almond-pubs.co.uk

63 Hulme Hall Road, Cheadle Hulme, SK8 6JZ

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the supervisory authority for data protection issues in the UK (phone: 0303 123 1113 or at www.ico.org.uk/concerns). However, we would appreciate the chance to deal with your concerns before you approach the ICO, so please feel free to contact us in the first instance.

3. Changes to this Privacy Notice and Changes to Your Details

We will need to update this privacy notice from time to time as the law and/or our business changes and develops. We will endeavour to tell you in advance by sending a service message to you if we hold your email address. Otherwise, please look out for the flags on our websites and materials that indicates we have changed this privacy

notice. If you continue to use our websites and/or services after we have changed our privacy notice, we will take this as an indication that you accept the changes.

It is important that the personal data that we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

4. Third Party Links

Our website and the service may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, and/or service, we encourage you to read the privacy notice of every website, plug-in and/or application that you visit.

5. The Personal Data We Process

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may process different kinds of personal data about you, which we have categorised as follows:

- **Identity Data:** including your name, username (or similar unique identification numbers that we may apply to you), email address, marital status, title, date of birth and gender.
- **Contact Data:** including your billing address, delivery address, email address and telephone number(s).
- **Financial Data:** including payment card details.
- **Transaction Data:** including the details of the products and services purchased and the date, time and location of sale and your purchasing activity (including vouchers and coupons activity).
- **Technical Data:** including information we collect through your use of our website, where you came to our website from and where you went when you left our website, how often you visit and use our websites and mobile apps, technical information about the devices you use to access our websites and mobile apps (including your device's unique identifying codes (e.g. its "MAC" address), relevant IP address, operating system and version, web browser and version, and geographic location).
- **Profile Data:** including your username and password, purchases, orders or bookings made by you, your interests, your preferences, your feedback, your survey responses, your social media content (where this is in the public domain including posts and comments, pictures and video footage) and profile information and insight from organisations that already hold information on you (such as credit reference agencies and 'customer insight companies' who give us their views on your household, your status, as well as your possible preferences and behaviours).
- **Usage Data:** including information about how you use our website, products and services (such as details of your table reservations).
- **Marketing and Communications Data:** including your preferences in receiving marketing from us and our third parties, your communication preferences and information on what you view, click on and access in and through our marketing emails.
- **Sensitive Data:** including information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, trade union membership, and information about your health and genetic and biometric data (see section 6).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. **Aggregated Data** may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your **Usage Data** to calculate the percentage of users accessing a specific website feature. However, if we combine or connect **Aggregated Data** with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

6. Sensitive Data

In certain situations we have to collect Sensitive Data about you. Under data protection law this is known as "special category" data and includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, , trade union membership, and information about your health and genetic and biometric data.

When do we process Sensitive Data? We only collect and process Sensitive Data where you provide such information to us in the following situations:

- As part of any feedback and/or complaints which you raise with us, for example where you believe you have suffered a **health issue** following a visit to one of our venues (for example, suspected food poisoning or another health and safety incident), or where you believe we have been **discriminatory** against you (for example, discrimination based on race or sexual orientation). When you provide details of what happened, this may include giving us Sensitive Data. We are allowed to process this Sensitive Data (together with any other relevant information), to investigate, address and resolve your issue and to administer any possible legal claims or out-of-court procedures.
- Where you are **applying for a job** with us. In this situation, we can process your Sensitive Data because it is necessary for carrying out our obligations and rights related to employment law and your working capacity; this is covered in a separate Candidate Privacy Policy which is displayed when you apply for job, and a copy of it can be provided by emailing marketing@almond-pubs.co.uk. We do not routinely collect and process Sensitive Data in any other situations. If we do, we will obtain your explicit consent.

7. Profiling

We do, from time to time, process personal data about you in an automated way to evaluate certain personal aspects about you, including to enable us to analyse and make predictions about your interests and how you are likely to interact with our Group. This is commonly referred to as profiling and it is our way of providing you with a more bespoke customer experience based on how we think you engage with us and our Group.

The personal data about you that we process for profiling purposes includes your Identity Data, your Contact Data and your Profile Data. We do not process personal data about you for profiling purposes that consists of Special Category Personal Data. We process your personal data for profiling purposes for our legitimate interests as set out [below](#). You also have the right to object to us processing your personal data for profiling.

How We Profile and the Logic We Use

We collect your personal data from several sources, including directly from you, which we then combine in order to create a view of your interactions with our group of companies. Once we have this record, we match multiple variables that are unique to you (such as name, email, postcode and/or mobile number) to create an overall matched record. We then clean the record by comparing it with certain third-party reference files (such as the Post Office Address File, the Bereavement Register and email validation) to try to ensure that the record is as accurate as possible.

Once the record is cleaned, we add the record to our customer database and we start to build a behavioural profile about you, which details the brands that you do, or do not, engage with. We also infer a visit to a particular brand location so that we can gain a better understanding of how far you might travel to visit a particular brand of ours. In addition, we apply our algorithms or scoring models to the record to indicate how likely it will be that you will visit a particular brand in the future. We then segment our overall database to create a customer base for each brand to determine those customers with a high likelihood to visit a brand and those who are unlikely to visit a brand. Your record may be in more than one segmented element of the database, for example, you may be high likelihood for 3 of our brands and low likelihood for 2 of our brands within your catchment area.

As well as looking at how you interact with our brands, we also apply demographic profiles (provided to us by a third party supplier of demographic data) to your record using your postcode. These profiles are trends based on a nationally representative sample. This enables us to understand your likely profile such as age, home and financial situation as well as your attitudes to family, home life, matters such as dining, media consumption or your purchasing behaviour.

Finally, to ensure that you get the most relevant communications from us, we may use the above variables (if you have agreed to us sending you certain communications) to select an appropriate communication for you to receive, as well as ensuring the you receive the right content or offer. For example, our profiling will help us determine whether you may be more interested in a family message and offer as opposed to a champagne promotion. We enhance this information with data we have regarding the communications and promotions that you have (or have not) engaged with in the past.

Significance and Consequence of the Profiling

The profiling we do enables us to better understand how you interact, or may interact, with our brands. It enables us to provide you with the most relevant information (such as vouchers and offers where you have agreed to receive

these) and to determine whether a particular brand or outlet should be more tailored to those people who do, or who are likely to, visit it. The profiling also helps us to improve our services and the offerings of our brands depending on the demographic of existing or future visitors.

8. How We Collect Your Personal Data

We use different methods to collect personal data from and about you including through:

- **Direct Interactions:** you may give us your Identity, Contact, Financial, Profile and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you purchase our products or services, book a table with us, , join our regulars club, subscribe to our services, news, offers, promotions and updates or groups, request marketing to be sent to you, enter a competition or promotion, complete a survey or give us feedback.
- **Social Media Interactions:** our website and services may allow you to interact with them by using your social media applications. This interaction may result in us collecting some of your social media content (including posts and comments, pictures and video footage), but only where this content is in the public domain and/or where this content has been sent by you to us in a private message via social media; and also your Technical, Profile and Marketing and Communications Data.
- **Automated Technologies:** as you interact with our website and our services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Other Third Parties or Publicly Available Sources:** we may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers such as Google, advertising networks search information providers.
 - Marketing and Communications Data and Technical Data from online advertising data providers such as Google based outside the EEA.
 - Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data and Marketing and Communications Data from third party affiliate sites such as Vouchercloud and Vouchercode based in the EEA and table booking service providers such as Bookatable and Opentable based in the EEA.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Profile Data and Marketing and Communications Data from social media providers such as Facebook based inside and outside of the EEA
 - Identity, Contact and Profile Data from data brokers or aggregators.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.

9. How We Process Your Personal Data

We only process your personal data when allowed to do so by law. Most commonly, we will process your personal data:

- With your consent and please note that you have the right to withdraw your consent at any time by [contacting us](#).
- Where we need to perform a contract we are about to enter into, or have entered into, with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

The below table sets out how we process your personal data. Please contact us if you would like further information about the specific basis for processing.

Activity	Personal Data	Basis for Processing
<p>To process and deliver a product or service that you have ordered from us, including:</p> <ul style="list-style-type: none"> • gift card purchases • when we issue a refund • to manage the payment, fees and charges • to collect and recover money owed to us 	<p>Identity Data Contact Data Financial Data Transaction Data</p>	<p>Performance of a contract with you Necessary for our legitimate interests, being to recover debts due to us.</p>

Activity	Personal Data	Basis for Processing
<ul style="list-style-type: none"> any other contractual arrangement that we agree to enter into with you 		
<p>To process your registration with us including:</p> <ul style="list-style-type: none"> to receive news, offers, promotions and updates to receive a voucher 	Identity Data Contact Data Profile Data	Performance of a contract with you
<p>To tailor our direct marketing to you and to send you direct marketing communications including via:</p> <ul style="list-style-type: none"> Email 	Identity Data Contact Data Technical Data Transaction Data Usage Data Profile Data Marketing and Communications Data	<p>In terms of tailoring our direct marketing, necessary for our legitimate interests, being to develop our business and inform our marketing strategy</p> <p>In terms of sending direct marketing where you are a customer and have not previously opted out of receiving such direct marketing, as necessary for our legitimate interests, being to offer you relevant products and services related to what we have previously provided to you</p> <p>In terms of sending direct marketing where you are not one of our customers, with your consent given when you sign up to our mobile app, website or otherwise give your details and provide consent when doing so</p>
<p>To enable you to take part in prize draws, competitions or surveys</p>	Identity Data Contact Data Usage Data Profile Data Marketing and Communications Data	Performance of a contract with you Necessary for our legitimate interests, being to study how customers use our products and services, to develop them and grow our business
<p>To understand our customers, matching common information from various sources to build a profile of you; this may include:</p> <ul style="list-style-type: none"> understanding your habits, where you are from time to time, your personal circumstances and those of your family or household, and the things you may like, dislike and be interested in the ways you interact with us, such as subscribing to news, offers, promotions and updates, booking tables, completing surveys, entering competitions, using our Wi-Fi, mobile apps, browsing website pages, interacting – e.g. by likes and comments – with our social media accounts and reviewing our products and services in public forums creating Aggregated Data 	Identity Data Contact Data Technical Data Transaction Data Usage Data Profile Data Marketing and Communications Data	Necessary for our legitimate interests, being to develop our business, products, services, content and advertising campaigns to make these relevant for you, and tracking the effectiveness of our advertising campaigns
<p>To manage our relationship with you, which includes:</p>	Identity Data Contact Data	Performance of a contract with you Necessary to comply with a legal

Activity	Personal Data	Basis for Processing
<ul style="list-style-type: none"> to notify you about changes to our privacy policy to communicate with you about operational changes to our products, services, website, for example if we were to withdraw one of our apps to gather feedback from you about our brands, websites, mobile apps and other services and activities from time to time to respond to, deal with and address any questions, suggestions, issues or complaints you have raised and reporting and analysis in respect of these to respond to any social media reviews, posts or other public comments you make about us, our brands, websites, mobile apps, services or other activities 	Profile Data Marketing and Communications Data Sensitive Data (only as required for dealing with feedback and complaints about specific issues)	obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<p>To administer and protect our business and website and offer safe and secure use of our products and services, which includes:</p> <ul style="list-style-type: none"> the process of anonymising your information so that you are no longer identifiable to us, where we no longer need your data in an identifiable form to provide safe access to our websites, mobile apps and Wi-Fi networks to power user security measures and services, such as recognition of your usernames and passwords, as well as reset functions to monitor security measures around our website and Wi-Fi networks to check they are not being abused or threatened to protect you and our business against potential criminal behaviour, such as fraud to administer troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data 	Identity Data Contact Data Technical Data Usage Data Profile Data Marketing and Communications Data	Performance of a contract with you Necessary for our legitimate interests, being to run our business, ensure network security and prevent potential criminal behaviour Necessary to comply with a legal obligation
<p>To provide information to legal and regulatory bodies where we are under a legal or regulatory obligation to do so</p>	Identity Data Contact Data Technical Data Transaction Data Usage Data Profile Data Marketing and Communications Data Sensitive Data	Necessary to comply with a legal obligation

10. How We Share Your Personal Data

We cannot run our business or provide many of the services and benefits you expect to receive without involving other people and businesses. We only share your information in accordance with the laws applicable to us and for the purposes set out in the table in paragraph 8 above.

We share your personal data with:

- All of our **Group** including new companies, brands or outlets we might acquire in the future (acting as controllers or processors) who are all based in the EEA and who provide IT, HR, system administration services and for whom you may have agreed can provide you with marketing communications.
- **Service providers** (mainly acting as processors, but sometimes as controllers) who help us provide our website, Wi-Fi networks and related services to you; for example, information technology companies who design and host our websites, payment services companies who enable you to use credit or payment cards with us, and data insight specialists.
- **Affiliated third parties** (acting as processors and controllers) that provide services to us such as market research, table booking, voucher supply and redemption, marketing insight services and data analytics services.
- Any new **business partners** (acting as controllers or processors) we may have over time; for example if we enter into a joint venture, reorganisation, business merger or sale of part of our business, the other party may receive some or all of your information.
- Our **professional advisors** (acting as controllers or processors); for example, our lawyers, insurers and insurance brokers, when they need it to provide advice to us or help us obtain insurance.
- The **Police**, the Health and Safety Executive, **local authorities**, **Her Majesty's Revenue and Customs (HMRC)**, the **Courts** and any other **central or local government bodies** (acting as controllers or processors) where we are required to do so to comply with our legal obligations, or where they request it and we may lawfully disclose it, for example for the prevention and detection of crime or to report serious health and safety incidents.
- We also may share the information we collect with **other third parties** where we are legally obliged to do so; for example, to comply with a court order.

11. How We Keep Your Personal Data Secure

We take the security of your personal data very seriously and have in place appropriate security measures at all times, including where we share your information with our suppliers and partners, to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Please take care of your own information. For security tips and tricks when using the internet, Wi-Fi and smartphones or tablets, please visit www.getsafeonline.org.

12. Our Retention of Your Personal Data

We can only keep your personal data for as long as necessary for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The precise length of time we hold your personal data for varies depending on the individual circumstances, but in determining the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We regularly review our retention periods to ensure that we are not keeping your data for longer than necessary. Details of retention periods for different aspects of your personal data are available by [contacting us](#).

14. Your Rights

In certain circumstances, you may have the right to request access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object to and/or restrict our processing of your personal data. Details of the rights are set out below.

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision (this may happen in the context of our recruitment process where we collect information relating to whether or not a candidate has unspent criminal convictions).
- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Rectification:** you may request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Erasure:** you may request erasure of the personal data that we hold about you. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object:** you may object to how we are processing your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Restriction:** you may request that we restrict how we process your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdrawal of Consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise any of these rights please contact us using the details in [paragraph 2](#).

The ICO regulates most UK data and information laws. To learn more about your rights, visit the ICO website at www.ico.org.uk.