

THE SUN INN



The Sun Inn Pub Company Limited – Privacy Notice

Version:- May 2018

WHAT IS THE PURPOSE OF THIS DOCUMENT?

The Sun Inn Pub Company Limited is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation and the UK Data Protection Act 2018 (GDPR).

The Sun Inn Pub Company Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

THE KIND OF INFORMATION WE HOLD ABOUT YOU.

We will collect, store, and use the following categories of personal information about you when you register using our website or via our third party service providers:

- Personal contact details such as your full name, postal address, telephone number, e-mail address and mobile telephone number.
- Demographic information such as preferences and interests.
- Your credit or debit card details where you make a payment. We process these only for the purpose of providing these to our secure third party payment providers (see below for details) and do not retain them after the payment is processed.

We will collect, store and use the following additional categories of personal information about you when you fill in our mailing list or guest forms:

- The name of your partner or spouse.
- The name(s) of your children.
- Your special dietary requirements.
- Your credit or debit card details where you make a reservation. We process these only for the purpose of providing these to our secure third party payment providers (see below for details) and do not retain them after the payment is processed.

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We will automatically collect the following categories of personal information about you when you use our website:-

- Your IP address (automatically collected)
- Your web browser type and version (automatically collected)
- Your operating system (automatically collected)
- A list of URLs starting with a referring site, your activity on this Website, and the website you exit to (automatically collected)
- Your Cookie information (see our <http://www.thesuninndedham.com/cookiestatement> for details)

If you provide us with any personal data relating to any third party (e.g. information about your spouse, children, employees or colleagues) for particular purposes, by submitting such information to us, you warrant and represent to us that you have obtained the consent of such third party to provide us with their personal data for the respective purposes.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information from you when you make a reservation or booking with us online, in person or over the phone.

We also collect personal information from you when you fill in our .mailing list sign-up form, or guest forms, or by connecting using our social media websites.

If you use our guest WiFi network we may collect identifiers in relation to your device including IP address.

We have CCTV installed in our premises in public areas and particularly around entrances and exits; this is for the purposes of prevention and detection of crime and employee monitoring.

We also collect personal information from you when you subscribe to any of our marketing communications, complete our voluntary customer surveys, enter our competitions or provide feedback. These may be carried out online, by telephone or in person.

We will collect personal data about you from our third party partners (further details of which are set below in the *Data Sharing* section) when you use them to make a booking, reservation or payment.

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HOW WE WILL USE INFORMATION ABOUT YOU.

Purposes for which we will use your personal information

We will only use your personal information when the law allows us to. The purposes for which we will process your personal information and the bases for this processing are as follows:

To allow us to process your bookings, table and accommodation services including sharing your data with party payment providers. The basis for this processing is that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.

To allow us to answer queries you have raised in relation to our services. The basis for this processing is that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.

To allow us to process your voucher purchases including sharing your data with third party payment providers. The basis for this processing is that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.

To allow us to provide our food and beverage facilities and services including sharing your data with third party payment providers. The basis for this processing is that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.

To allow us to contact you via email, phone or post about related products and services which we or other group companies think may be of interest to you or for market research purposes (including to allow us to improve and update our website and services). The basis for this processing is that you have given consent to the processing and the processing will only continue whilst such consent has not been withdrawn.

To allow us to undertake surveys, competitions and related activities where you have specifically agreed to take part in these. The basis for this processing is that you have given consent to the processing and the processing will only continue whilst such consent has not been withdrawn.

To allow us to provide our guest WiFi service. The basis for this processing is that it is necessary as part of our legitimate interest in providing an effective guest WiFi service.

For internal record keeping and to allow us to maintain appropriate records in relation to our business and to allow us to comply with any applicable laws, regulations, codes of practice or guidelines issued by any legal regulatory body which are binding on us. The basis for this processing is that it is necessary for compliance with legal obligations to which we are subject.

To pass on to the police and government authorities as requested by them, for example in cases of fraud and theft. The basis for this processing is that it is necessary for compliance with legal obligations to which we are subject.

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If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

"Special Categories" of sensitive personal information.

We do NOT generally collect, store or use the following "special categories" of more sensitive personal information (such as information about race or ethnicity, religious beliefs, political opinions, health etc.).

However, we may collect and process limited special category data if you provide us with details of any health or medical conditions when you tell us about special dietary requirement or disabilities which are relevant to your booking or reservation. If we process any such information the specific basis for this processing will be that you have given your explicit consent to the processing for the purpose of processing your booking or reservation. By providing this information when you make a booking or reservation you consent to us processing it for this purpose.

Automated decision-making

We do NOT use Automated decision-making to process personal data.

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DATA SHARING

We may need to share your data with third parties, including third-party service providers where this is necessary to provide our services to you, is required by law or where we have another legitimate interest in doing so.

In particular we may share your data with third party processors who we engage to process your data on our behalf in order to allow us to provide our services to you, including:-

- Mailchimp (for the handling of mailing lists and email marketing). Their privacy policy can be found at: <https://mailchimp.com/legal/privacy/>

We also work with the following third party partners, some of whom are data processors on our behalf and some of whom will collect and process your data themselves as data controllers and share it with us:-

- Resdiary (for table bookings). Their privacy policy can be found at: <https://sales.resdiary.com/privacy-statement/> and their terms of use can be found at <https://www.resdiary.com/Terms>
- InnStyle (for room bookings). Their privacy policy can be found at <https://www.innstyle.co.uk/privacy-policy> and their terms of use can be found at <https://www.innstyle.co.uk/guest-terms/>
- Stripe (for voucher payment processing). Their privacy policy can be found at <https://stripe.com/gb/privacy>. We can access your contact info via Stripe and what vouchers have been purchased but we cannot access your payment details.
- Global Payments GBUK LLP (for secure payment processing). Their privacy policy can be found at <https://www.globalpaymentsinc.com/en/privacy-statement>.

To the extent that these partners are responsible as data controllers for the collection and processing of your data you should refer to their privacy policies and terms of use as set out above in relation to this.

We operate a centralised reservation system use of which is shared by the Baker Hospitality Group Limited. This means that any personal data you have shared with us for booking purposes is available in that system to the Baker Hospitality Group Limited for reservations and management purposes.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

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What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We may transfer the personal information we collect about you to countries outside the EU in order to perform our contract with you. When we do so, we will determine whether there is an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

We may transfer personal information we collect about you to servers hosted in the USA. We will ensure that any the providers of such servers are certified under the EU-USA Privacy Shield Framework.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties that need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. If, for any reason, you

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cease to be a customer of the company, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Should you choose to unsubscribe from our mailing list, please note that your personal Data may still be retained on our database for up to 12 months or to the extent permitted by law and that we may retain your email address on a "do not add" list to ensure that you cannot be re-subscribed to the list without your consent.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our compliance manager, Piers Baker whose contact details are as follows:

- office@thesuninndedham.com

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No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our compliance manager, Piers Baker, whose contact details are listed above (see paragraph headed “Your rights in connection with personal information”). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Compliance Manager

We have appointed a Compliance Manager, Piers Baker to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the compliance manager using the contact details listed above (see paragraph headed “Your rights in connection with personal information”).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact our compliance manager.