



## **THE PEACH PUB COMPANY LIMITED**

### **WEBSITE PRIVACY POLICY**

#### **INTRODUCTION**

Welcome to The Peach Pub Company Limited's privacy policy.

The Peach Pub Company Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. [\*\*Important Information and Who We Are\*\*](#)
2. [\*\*The Data We Collect About You\*\*](#)
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## 1. IMPORTANT INFORMATION AND WHO WE ARE

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how The Peach Pub Company Limited collects and processes your personal data, including any data you may provide when you browse our website, sign up to our marketing communications, register to use our WiFi, order food or drink through our affiliated partner website or our app, book tables or rooms with us or order online gift cards.

Our website is not intended for children and we do not knowingly collect data relating to children via our website. For information on how we may collect and process personal data relating to children generally, please see the section below on [Children's Data](#).

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

### **Controller**

The Peach Pub Company Limited is the controller and responsible for your personal data (collectively referred to as **Peach Pubs, we, us** or **our** in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise [Your Legal Rights](#) please contact the data privacy manager using the details set out below.

### **Contact details**

Our full details are:

Full name of legal entity: The Peach Pub Company Limited. We are registered in England and Wales under number 04336195 and we have our registered office at Peach Barns, Somerton Road, North Aston, Oxon, OX25 6HX.

Name of data privacy manager: Tony Bobath

Email address: [gdpr@peachpubs.com](mailto:gdpr@peachpubs.com)

Postal address: Peach Barns, Somerton Road, North Aston, Oxon, OX25 6HX

Telephone number: 01869 220110

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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Data protection law requires Peach Pubs, as controller for your data:

- to process your data in a lawful, fair and transparent way;
- to only collect your data for explicit and legitimate purposes;
- to only collect data that is relevant, and limited to the purpose(s) we have told you about;
- to ensure that your data is accurate and up to date;
- to ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- to ensure that appropriate security measures are used to protect your data.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 22<sup>nd</sup> July 2022 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the data privacy manager of any changes in your data at the following email address: [GDPR@peachpubs.com](mailto:GDPR@peachpubs.com)

### **Third-party links**

This website 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 and organisations connected with us have a social media presence for the purpose of engaging with you.

If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media,

we encourage you to read the privacy policy of every website of forum that you visit or use.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, 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 collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier and date of birth.
- **Contact Data** includes your home address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Dietary Data** includes information about your dietary requirements.
- **Health Data** includes information you may provide where you believe you have suffered a health issue following a visit to one of our venues (e.g. suspected food poisoning or another health and safety incident).
- **Accessibility Data** includes information about any particular access needs you may share with us in relation to an upcoming booking or stay (for example, if you require wheelchair access).

We refer to the above categories of data in the [‘Purposes for which we will use your personal data’ tables](#).

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 policy.

### **If you fail to provide personal data**

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 food, drink or accommodation). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

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

- **Direct interactions.** You may give us your Identity, Contact, Financial, Dietary, Health and Accessibility Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about or make a booking for food, drinks or accommodation;
  - order food or drink through our affiliated partner website or our app;
  - subscribe to our service, SMS, push notifications or newsletter;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey;
  - give us some feedback (including compliments and complaints) or contact us.
- **Automated technologies or interactions.** As you interact with our website, 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.
- **Third parties.** We may receive personal data about you from various third parties as set out below:
  - Technical Data from the following parties:
    - analytics providers such as Google based outside the UK;
    - advertising networks; and

- search information providers.
- Contact, Financial and Transaction Data from providers of technical and payment services or third party booking sites.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the 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.
- We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

[Click here to find out more about the types of lawful basis that we will rely on to process your personal data.](#)

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

#### **Purposes for which we will use your personal data**

##### **Our partners**

- OpenTable
- Fydelia
- Reslinks
- VoucherCart
- Access/Acteol/Atreemo
- Design My Night
- Pepper
- Shopify
- Serenova

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal

ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity   | Type of data  | Lawful basis for processing including basis of legitimate interest   | Third party processing and international transfer information   |
|--|---|--|---|
| <b>To register you as a new customer, or as a user of our WiFi</b>   | <ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> <li>(e) Profile</li> </ul>  | Performance of a contract with you   | We may collect and/or process this data via our third party partner sites (e.g. Fydelia)  |
| <b>To process and deliver your order or booking including:</b><br><ul style="list-style-type: none"> <li>(a) <b>Providing you with food, drink, gift cards or accommodation and ensuring we meet any specific needs you inform us of</b></li> <li>(b) <b>Managing payments, fees and charges</b></li> <li>(c) <b>Collecting and recovering money owed to us</b></li> </ul> | <ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Transaction</li> <li>(e) Marketing and Communications</li> <li>(f) Dietary</li> <li>(g) Accessibility</li> </ul> | <ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to recover debts due to us)</li> </ul>  | We may collect and/or process this data via our third party partner sites (e.g. OpenTable, Pepper (order processing) and Shopify) |
| <b>To manage our relationship with you which will include:</b><br><ul style="list-style-type: none"> <li>(a) <b>Notifying you about changes to our terms or privacy policy</b></li> </ul>  | <ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Marketing and Communications</li> </ul>  | <ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul> | We may collect and/or process this data via our third party partner sites   |

|   |  |   |  |
|---|--|---|--|
| <b>(b) Asking you to leave a review or take a survey</b>  |  |   | (e.g. HGEM, Atreemo)   |
| <b>To enable you to partake in a prize draw, competition or complete a survey</b>   | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications                  | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)  | We may collect and/or process this data via our third party partner sites (e.g. HGEM)                |
| <b>To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</b> | (a) Identity<br>(b) Contact<br>(c) Technical   | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br><br>(b) Necessary to comply with a legal obligation | We may collect and/or process this data via our third party partner sites                            |
| <b>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</b>                       | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications<br>(f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)   | We may collect and/or process this data via our third party partner sites (e.g. Atreemo and Shopify) |
| <b>To use data analytics to improve our website, products/services, marketing,</b>  | (a) Technical<br>(b) Usage   | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and   | We may collect and/or process this data via our third  |

|  |  |   |   |
|--|--|---|---|
| <b>customer relationships and experiences</b>  |  | to inform our marketing strategy)   | party partner sites (e.g. HGEM, Atreemo, Shopify)   |
| <b>To make suggestions and recommendations to you about events, goods or services that may be of interest to you</b> | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile                   | Necessary for our legitimate interests (to develop our products/services and grow our business)   | We may collect and/or process this data via our third party partner sites (e.g. Atreemo)                    |
| <b>To investigate, deal with and respond to your complaint</b>   | (a) Identity<br>(b) Contact<br>(c) Transaction<br>(d) Profile<br>(e) Dietary<br>(f) Health | Necessary for our legitimate interests (to deal with complaints and ensure the satisfaction of our customers, and to improve our business and services) | We may collect and/or process this data via our third party partner sites (e.g. Atreemo, Shopify, Serenova) |

## **Children's Data**

We recognise that personal data relating to children (**Children's Data**) requires extra protection.

We only collect and process Children's Data in the following situations:

- To process bookings for events at which children might be in attendance, where such children have specific needs that you choose to inform us about (e.g. the need for a highchair or a particular dietary requirement).
- To respond to enquiries and deal with bookings relating to children's parties and events. You may choose to provide us with children's names, ages and dietary requirements as part of the booking process for such events.
- Where a child has suffered a health issue following a visit to one of our venues (for example, suspected food poisoning or another health and safety incident).
- Where a child logs into our WiFi network, we collect Identify Data, Contact Data, Technical Data, and Usage Data.

We may process Children's Data:

- where we have a legitimate interest in doing so (to ensure availability of highchairs, to understand and accommodate dietary requirements, to deal with feedback and complaints and to understand how customers interact with our websites);
- where it is required for the performance of a contract (where a customer makes a booking for a children's party and chooses to provide children's data); or
- whenever required to comply with a legal obligation;

and, in any of these situations, where and only to the extent that the processing is necessary.

In some limited circumstances and where necessary we may alternatively, or in addition, process Children's Data on the basis of consent, given or authorised by the holder of parental responsibility (unless it is appropriate to obtain consent directly from the relevant child, and in all circumstances we will always make reasonable efforts to verify such consent).

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can manage your marketing preferences or opt out of marketing at any time by following the opt-out links on any marketing message sent to you or by contacting us.

## **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage, Order history and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or provided your details to us in connection with a booking or stay, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a booking or other transaction.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [here](#).

## **Change of purpose**

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. DATA SECURITY**

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

We have 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.

## **7. DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your personal data 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, regulatory, tax, accounting or other requirements. As a rule, if a guest hasn't engaged with us (visited and opened an email) in the last three years we will remove their data from our CRM system. This is done on an annual basis.

Details of retention periods for different aspects of your personal data are available on request, please [contact us](#) for further information.

In some circumstances you can ask us to delete your data: see [Request Erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **8. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the section below on [Your Legal Rights](#) to find out more about these rights.

If you wish to exercise any of these rights, please [contact us](#).

### **No fee usually required**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. GLOSSARY**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **THIRD PARTIES**

### **Internal Third Parties**

Other companies in the Peach Pub Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

### **External Third Parties**

- DoeTaylor in the UK provide IT and system administration services.

## **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** 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.

**Request erasure** of your personal data. 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 to processing** of 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.

**Request restriction of processing** of 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.

**Request the transfer** of your personal data to you or to 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. 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.

**Withdraw consent at any time** where we are relying on consent to process your personal data. 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.