

PRIVACY POLICY

Version 2.0

April 2019

Great British Inn and its sister companies: CopperBirch Inns & Great British Inn, respect the privacy rights of its customers, employees and contractors and recognises the importance of protecting the information collected about them. We have adopted a Privacy Policy that demonstrates how we collect, store and use the information that you provide us with.

1. Collection of personal data:

You may supply your personal details to the Company directly, such as:

- a marketing data capture form;
- making a booking;
- a form to place an order;
- via our website;
- a gift card purchase;
- a loyalty scheme;
- a subscription;
- via social media posts and interaction;
- an application of employment;
- an application to supply services.

2. Purposes of processing to:

- provide you with information or services that you have requested;
- carry out any contractual obligations;
- provide you with details of any changes to our service
- keep you informed of recent offers, entertainment and service offering;
- verify your identity;
- verify you are over the age of 18.

3. The legal basis of processing:

The legal basis we rely upon to offer these services to you are:

- consent;
- legitimate interest, including existing relationship, enable payment to individuals, enable payment processing for a service provided;
- legal obligation;
- statutory or contractual requirement.

If your personal data is required by law and/or a contractual requirement and/or a requirement necessary to enter into a contract, you are obliged to provide the personal data and if you do not provide the data then the consequences of this are that we will not be able to carry out the statutory or contractual requirement you have requested.

4. Cookies:

When you visit some areas of our website, a 'cookie' will be placed on your computer. This is a small file that enables our site to improve the quality of your visit. You are able to set your

browser to reject cookies, although this may affect the quality of your visit. For more information please see our cookies policy.

5. The personal data we may hold about you:

- contact details (including name, address, email and telephone number);
- date of birth;
- photographs;
- CCTV images captured within our properties;
- employment files;
- payment details.

6. Who we share personal data with:

We may share your information with any member of our group and subsidiaries. We may also share your information with selected third parties including:

- our business partners, suppliers and sub-contractors to carry out any contractual obligations we enter in with you;
- our suppliers for the purpose of contacting you directly about their offers, promotions or services (if you have agreed to be contacted for this purpose);
- for any legal obligation in order to enforce or supply personal information;
- an acquirer in the event of a sale, merger or acquisition of the company.

The third parties we use for delivery of our services are:

- *Booking Systems:*
 - Design My Night <https://www.designmynight.com/privacy-policy>
 - Welcome Systems <https://www.welcome-anywhere.co.uk/privacy-policy/>
 - Booking.com <https://www.booking.com/content/privacy.en-gb.html>
 - Laterooms.com <http://laterooms.com/simplytheguest/privacy-policy/>
 - Expedia <https://www.expedia.com/p/info-other/privacy-policy.htm>
- *CRM System:*
 - Footfall <https://footfalldriver.co.uk>
- *IT System:*
 - Net Essence Ltd <http://www.net-essence.com>
 - Solid Dev Ltd <http://www.soliddev.co.uk/privacy-policy/>
- *Payment Systems:*
 - Natwest Banking <http://www.natwest.com/privacy>
 - Stripe <https://stripe.com/gb/privacy>
- *Stock Management:*
 - Stocklink <http://www.ibs-systems.co.uk/privacy/>

7. Data security:

We have put in place technical and organisational measures to protect the confidentiality and the availability of your personal data. A password policy is currently in place to ensure that the data stored is only accessible by authorised personnel.

8. Sensitive personal data:

We will never collect sensitive personal data from our customers without your consent.

9. Storage of personal data:

Information is stored and held in a number of ways, including electronically local and at our offices in Little Brickhill, Bedfordshire in secure storage accessible via the internet on company pcs and paper-based.

10. CCTV:

To ensure your safety and the prevention and detection of crime, CCTV is in operation in all of our establishments. If we are requested to provide CCTV images of you by the police or another local or government authority investigating illegal activities, we are obligated to do so.

11. Data retention:

Where the Company has obtained your consent to process your personal data for marketing purposes, we will accept consent lasting for a 6 year period unless notified otherwise by you. Upon expiry of that period the Company will seek further consent from you.

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Other records are retained as detailed below:

- Terms & Conditions and Terms of Business (Retention 6 Years)
- VAT (Retention 6 Years)
- Company Accounts (Retention 6 Years)
- ITEPA Records (Retention 3 Years after last tax year)
- CCTV Coverage (Retention 4 Weeks)

12. Third party websites:

While we carefully select the websites to which we link, we are not responsible for the privacy practices or the content of these websites. By clicking on these links we encourage you to read the privacy notice of the website you are visiting.

13. Your rights:

Please be aware that you have the following data protection rights:

- the right to be informed about the personal data the Company processes on you;
- the right of access to the personal data the Company processes on you;
- the right to rectification of your personal data;
- the right to erasure of your personal data in certain circumstances;

- the right to restrict processing of your personal data;
- the right to data portability in certain circumstances;
- the right to object to the processing of your personal data that was based on a public or legitimate interest;
- the right not to be subjected to automated decision making and profiling;
- the right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by following the instructions on each communication or by contacting:

Alban Massingham
Email: alban@greatbritishinn.co.uk

14. Access to your data:

You have the right to access information in the form of a subject access request, or if you are concerned that the data about you is incorrect please email us at alban@greatbritishinn.co.uk

15. Updates to the Privacy Policy:

We reserve the right to change and update this Privacy Policy and these changes will be posted on our website. We encourage you to visit this page from time to time to ensure you are aware of any changes we may have made.

16. Complaints or queries:

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact:

Alban Massingham
Great British INN LTD
Email: alban@greatbritishinn.co.uk

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.