

## THE EMPEROR



OLD SPOT PUB CO.

## Privacy Statement

*We take privacy seriously. The purpose of this statement is to set out the principles governing our use of personal data we may obtain about you.*

### Who we are

Old Spot Pub Company Limited is the “Controller” of the personal data you provide us. We are registered with the Information Commissioner’s Office (ICO) and our registration number is ZA419543.

We work closely with our subsidiaries, agents, advisors, suppliers, contractors and partners to provide exceptional levels of service and support.

### The information we collect

In most circumstances, we will only collect basic personal data about you, which does not include any special categories of personal data about you (known as “sensitive personal data”). This data may however include name, email and/or other contact details.

Specific details about what personal data we collect, how and why we collect personal data about you, what we do with the personal data about you, specific retention periods and the consents that we require from you are contained in the individual privacy notices that are available from Old Spot Pub Company Limited’s <http://theemperorpub.co.uk/>.

### **Sharing information**

All the personal data is received and processed in the UK by our employees, agents, advisors, suppliers, contractors and/or partners. Old Spot Pub Company Limited will do not trade, sell or share your personal identifiable data for use by any third parties unless we have been authorised by you or are required by law to do so.

Please be aware however that your data may be stored on a cloud based system or on servers based outside the UK but within the EU.

### **How long we keep information**

We keep your personal data for no longer than reasonably necessary for the purposes for which it is provided. We will only keep personal data for longer if authorised by you or if we are required to do so by law.

If, for example, you have authorised use of your personal data for marketing purposes, this will be kept with us until you notify us that you no longer wish for us to use it. Specific retention periods are set out in the privacy notices linked above.

### **Securing your information**

We take the security of your personal data very seriously and have in place appropriate security measures. We protect the confidentiality, integrity and availability of personal data by implementing the following key practices:

- Integrate data minimisation techniques in to the collection and sharing of personal data. As a result, we only collect personal data that we need and share the bare minimum of personal data required to deliver a service.
- Personal data is destroyed or anonymised when it is no longer needed.
- Apply methods to ensure personal data is accessed and processed by authorised users and systems. Personal data is encrypted to make it unreadable to unauthorised parties.
- Provide data privacy, security and awareness training to employees to support secure handling practices.

- Supplier GDPR and security compliance strategies are implemented to ensure those we may share personal data with hold the same values as ourselves.

### **Your rights**

If you wish to see, correct, update, transfer or delete any of the personal data that we hold about you, please write to the Data Protection Officer at Old Spot Pub Company, 3 Monkspath Hall Road, Solihull, West Midlands, B90 4SJ with your request.

If you wish to raise a complaint on how we have handled your personal data or you have a general query related to data privacy, you can contact our Data Protection Officer by writing to The Data Protection Officer at Old Spot Pub Company Limited, 3 Monkspath Hall Road, Solihull, West Midlands, B90 4SJ, who will arrange for the investigation of the matter. We recommend that correspondence is sent recorded delivery and/or with proof of postage.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the [ICO](#).

### **Notification of data breaches**

If you discover a data privacy breach or a breach is notified to you please write to the Data Protection Officer at Old Spot Pub Company, 3 Monkspath Hall Road, Solihull, West Midlands, B90 4SJ. The letter should contain your contact information and key details of the breach.

### **Notification of changes**

We may occasionally modify our privacy policies, notices and statement. When this happens, we will provide details as to the changes on this web page or via the links on this web page, at the point of data collection or by contacting you directly. We will not significantly change how we use information you have already given to us without your prior agreement.

## **Cookies**

We also collect information about you using Cookies. A Cookie is an element of data that a website can send to your browser, which may then be stored on your system. We use Cookies on this website to allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our website. We use cookies so that we can give you a better experience when you return to our web site. Most web browsers automatically accept cookies. Read our [Cookie Policy](#) for more information about how we use Cookies. You do not have to accept Cookies, and you should read the information that came with your browser software to see how you can set up your browser to notify you when you receive a cookie. This will give you the opportunity to decide whether to accept it. Refusing Cookies may mean that you cannot access certain features of Old Spot Pub Company Limited website.

## **Links with other websites**

This Privacy Statement is in relation to Old Spot Pub Company Limited only. We are not responsible for the data policies or procedures or content of any linked websites. We recommend that you check the privacy statement of each website you visit.

## **Photography - Privacy Notice**

Why do we take photographs within our pubs and what do we use them for?

We may take photographs both inside and outside of our premises for direct marketing purposes, promotions, recruitment, reporting and internal communications. These may be published on our pub websites and social media sites. We may also use them in printed material for marketing and promotional purposes, recruitment, reports and brochures.

### **Why do we need to take photographs?**

We have a legitimate interest in using photographs taken both inside and outside of our premises for direct marketing purposes, promotions, recruitment, reporting and internal communications. Where practical customers' permission will be sought before photographs are taken. Sometimes it is not practical to seek permission from all customers, for example during special events and other busy times. On these occasions photographs may still be taken and used as indicated in this Privacy Notice. We seek to avoid publishing photographs of children without parental consent.

### **How long do we keep photographs for?**

We will keep photographs for 24 months.

### **Who do we share your image with?**

We do not sell photographs to a 3rd party. We may publish photographs on social media sites including Facebook, Twitter and Instagram.

We may also publish photographs on other social media sites that are compliant with the General Data Protection Regulation or EU-US Privacy Shield. We may send photographs to print companies so that they can be included in printed material.

### **Is your image processed outside of the UK or EU countries?**

Your image is captured and processed using photographic equipment and computer systems that are located within the UK or EU countries. We may publish photographs on social media sites that are hosted in the United States. We only use social media sites that are self-certified under the EU-US Privacy Shield data protection standard, which is compliant with the General Data Protection Regulation.

**Is any “profiling” performed using your image?**

No, we do not perform any kind of automated processing for the purposes of analysis or prediction using your image.

**What consent options do we offer and how do these affect you?**

We will endeavour to obtain consent to take and use photographs of individuals and groups of people. If you are aware that we are using your image and you would prefer that we did not then we will remove it at your request, delete it from our records and stop using it on any future printed material.

Old Spot Pub Company Limited