

## How we use your information

This policy describes how Johnson & Co Hospitality Ltd, Company number **9174314**, collects information about you or your actions whilst on our websites. You acknowledge and agree that your personal data may be processed in accordance with this policy. Without this, we will be unable to provide you with certain marketing communications.

- The terms of this privacy notice will apply to all information collected about:
  - visitors to our Website;
  - people who use our online services, such as those subscribing to our mailing lists; and
  - visitors to our Website who complete an enquiry form/contact application/request we act upon any information or request provided to us;
  - our customers filling in forms, or by corresponding with us by phone, e-mail, who make payments by card or otherwise.

## Information we may collect from you

- **Information you give us.** You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our products/services, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
  - **Information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number
  - **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics

providers, search information providers, credit reference agencies) and may receive information about you from them.

## **Where analytical data is collected following your visit to our Website, the data will be used to:**

- Ensure that content from our Website is presented in the most effective manner for you and for your computer.
- Provide you with information or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- Allow you to participate in the interactive features on our Website, where applicable.
- Notify you about changes to our services
- To meet our legal obligations and for establishing, exercising or defending our legal rights
- To provide a high level of customer service including assisting with any of your enquiries and bookings. To notify you of any security or data breach alerts and technical notices.

## **Disclosure of your information**

- We may share your personal information with selected third parties including:
  - Any member or our group or trading divisions;
  - Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with "aggregate" or "anonymised" information about our users; and
  - Analytics and search engine providers that assist us in the improvement and optimisation of our site
- We may disclose your personal information to third parties;
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation; This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

## **Transfer of your personal data outside of the UK or the European Economic Area (EEA)**

- Some third parties to whom we may transfer your personal data may be located outside of the UK or the EEA. In the event of a transfer, we will seek to ensure that appropriate safeguards to protect your data are in place which could include entering into a data transfer agreement with such third parties to ensure adequate protection for your information. Examples of the types of contractual clauses we may use can be found at the following link: [http://ec.europa.eu/justice/data-protection/internationaltransfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/internationaltransfers/transfer/index_en.htm).

## **Legal basis for processing your personal data**

- We will process your personal data where it is necessary:
- for the performance or entering into of a contract with you, including in order to provide our offering, process your payment and to respond to enquiries and bookings made by you;
- for compliance with our legal obligations;
- for the purpose of furthering our legitimate interests including to:
  - improve our offering and Digital Applications;
  - operate our Digital Applications efficiently and effectively;
  - carry out behavioural advertising; and
  - prevent, detect and investigate fraud or illegal activity.
- We may also process your personal data on the basis of any consent given by you. This consent may be updated by visiting our preference centre – see section 12\*.

## **Protection of your personal data**

- We are committed to protecting your personal data and to keeping it safe and confidential. We will therefore ensure that appropriate technical and organisational physical, electronic and procedural safeguards are implemented to protect it. Access to your personal data will also be limited to our employees and certain third parties who process it on our behalf.

## **Storage of your personal data**

- Your personal data will generally be stored for up to 5 years.
- We may, however, keep your personal data for longer than 5 years if we need it to fulfil our contractual obligations to you, the law requires us to maintain it for a longer period or you have not withdrawn your consent.

## Your rights

- You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us
- Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Access to information

- The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## Changes to our privacy policy

- Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## Contact

- Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Johnson & Co Hospitality Ltd.

### Use of Cookies

- Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently. Whilst we have sought to keep the number of cookies to a minimum, there are several cookies we which have elected to use when you visit the Website.
- Should you elect, whether through your browser settings or other method we may choose to make available through the Website, not to receive cookies, the functionality of the Website and the services provided through the Website may be limited or ineffective.
- The table below explains the cookies we wish to use on the Website and why they are collected:

<b>Cookie</b>	<b>Name</b>	<b>Purpose</b>
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to monitor how visitors use our Website. The anonymous information collected will help us improve the experience of using our Website for visitors through the collation of web traffic patterns, user preferences as well as information on how you came to find our Website.
Cookie Control	civicAllowCookies	This cookie is just used to (anonymously) record whether or not a visitor to this website allows the use of cookies.

### Third Party Cookies

- Where you have accessed our Website via a third party website, your web browser may have already accepted a cookie. Whilst we are unable to accept any responsibility for these third party cookies (as they are not promoted or created by us), we would recommend that you review the privacy policy for any search engines or websites that have linked you to our Website, so that you may fully understand the privacy policies they currently have in place.

### Personal Cookie Settings

- Your browser settings will allow you to manually control your personal cookie settings and further information can be found in the 'Help' section of your chosen web browser.
- To find out more about cookies, including details of cookies that have been set and how to manage and delete them, please visit [allaboutcookies.org](http://allaboutcookies.org).

### Card Payments

- We do not store credit card details nor do we share customer details with any 3rd parties, subject to the 'Disclosure of Personal Information' section below.

### Complaints or Queries

- We strive to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading

or inappropriate. We would also welcome any suggestions for improving our procedures.

## Disclosure of Personal Information

- In almost all circumstances we will not disclose personal data without your consent. However, when a complaint is investigated, for example, it may be necessary to share personal information with the particular organisation or governing bodies concerned. Further information is available upon request about the factors we shall consider when deciding whether information should be disclosed.
- Further examples of when disclosure may be required include:
  - where you have elected to utilise the interactive services and/or third party portals we offer through our Website, disclosure may be required in order to obtain the necessary licences and consents; or
  - if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply of services and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection.

## Linking

- Our Website may from time to time contain links to and from the websites of third party partner networks, advertisers and/or affiliates. If you follow a link to any of those websites, please note that those websites are obliged to have their own privacy policy and that we do not accept any responsibility or liability for those policies or the content or compliance of their websites. Please check those policies before you submit any personal data to those websites and ensure you have read and understood their terms of use.

## Access to information

- The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £30 +VAT to meet our costs in providing you with details of the information we hold about you.

## Changes to Our Privacy Policy

- Any changes we may make to our privacy policy in the future will be posted on this webpage. Due to the number of visitors to our Website, we

are unable to notify you when any changes are made so we request that you periodically review this page for any updates to our privacy policy.

### How to Contact Us

- Requests for information about our privacy policy may be emailed to the Data Controller or in writing at the following address:
- Johnson & Co Hospitality Ltd, Pedler, 58 Peckham Rye, London, SE15 4JR, United Kingdom
- Alternatively you can email us at [hello@pedlerpeckhamrye.com](mailto:hello@pedlerpeckhamrye.com)