

## Privacy, Data Protection and Cookies Policy

### Introduction

Welcome to Reddington Pub Company Limited's (**RPC/ we/ us**) data protection, privacy and cookies policy. We trade as the "**Reddington Group of Pubs**", which includes The Reindeer Hoveringham, Nottinghamshire (**Reindeer**) and Old Volunteer, Caythorpe, Nottinghamshire (**Old Vol**) (together referred to as **Our Pubs**).

RPC respects your privacy and is committed to protecting your personal data. This policy together with our Terms of Use and any other documents referred to in it, set out the basis on which any Personal Data (as defined below) we collect from you or which you provide to us will be processed by us as a result of using or interacting with our websites as set out below.

RPC aims at all times to process and collect your data lawfully, transparently, fairly and without adversely affecting your rights as a Data Subject (as defined below). Please read the following carefully to understand our practices and procedures. The websites we operate are: [www.reindeerpub.com](http://www.reindeerpub.com), its related domains and sub domains (**Reindeer Site**), which is hosted by Word Press in respect of the Reindeer and [www.oldvolpub.com](http://www.oldvolpub.com), its related domains and sub domains (**Old Vol Site**) in respect of the Old Vol which is hosted by Word Press. The Reindeer Site and Old Vol Site are collectively referred to as "**Our Sites**" in this policy.

We also operate a mobile app at the Old Vol which enables our customers to order food and beverages. The app is accessed via a QR code. (**Our App**)

### Please note:

By giving your consent, you are accepting and consenting to the practices described in this policy. If you do not give your consent, please navigate away from Our Sites or Our App (as the case may be).

You may withdraw your consent at any time. An explanation of your rights is set out below.

For the purpose of the Data Protection Legislation (as defined below), the data controller is Reddington Pub Company Limited, a company registered in England and Wales with company number 13641783, whose registered office is at Unit 13e, 92 Burton Road, Sheffield S3 8BX.

Our nominated representative, as Data Privacy Manager is Maxine Griffiths- Parker for the purpose of the Data Protection Legislation.

If you are not satisfied with any action taken by us or response given, you have the right to complain to Information Commissioner at [www.ico.gov.uk](http://www.ico.gov.uk), or help line telephone number: 0303 1231113.

### Definitions

In this policy the following terms shall have the following meanings:

**Cookie:** a small file placed on your computer or device by Our Sites when you visit certain parts of Our Sites and/or when you use certain features of Our Sites.

**Cookie Law:** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

**Data Protection Legislation:** all applicable legislation relating to the privacy of personal data in the UK including the UK GDPR and the Data Protection Act 2018 (or any replacement or successor legislation).

**Data Subject:** a natural identifiable person.

**personal data:** has the meaning set out in the Data Protection Legislation, being as at the data of this policy, any data which identifies a natural person (by way of example, name, address, phone number and so on).

### **What this policy also covers**

This policy also explains:

- What personally identifiable information of yours is collected:
  - on Our Sites, when you interact with either one of them;
  - when you download from either one of Our Sites;
  - when you interact with either one of Our Sites including making an enquiry or a booking.
- What organisation is collecting the information;
- How the information is used;
- With whom the information may be shared;
- What choices are available to you regarding collection, use and distribution of the information;
- What kind of security procedures are in place to protect the loss, misuse or alteration of information under RPC's control;
- How you can correct any inaccuracies in the information; and
- How you can request the information we process and store to be removed.

### **There are other terms that may apply to you**

In addition to this policy, please refer to our Terms of Use, terms of booking and group booking/ event terms (**Our Other Terms**) Some or all of Our Other Terms may apply when you book a table or event with us and, buy goods and services from us.

### **We may make changes to these terms and our website and your duty to inform us**

We may update and change these terms, Our Sites and/or Our App from time to time for a variety of reasons. By way of examples: to reflect changes to the products and services we offer, user's needs, regulatory or legal requirements. Every time you wish to use or interact

with either one of Our Sites or Our App, please check these terms to ensure you understand the terms that apply at that time. These terms were updated on **24 May 2024**.

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

### **Children under the age of 18**

In accordance with licensing and other applicable laws, persons under the age of 18 are not eligible to buy our goods or services and we ask that minors do not submit any personal information to us. We will not knowingly accept any data from a person who is under the age of 18 years.

By using one of Our Sites or Our App, you are confirming you are 18 years of age. We reserve the right at all times to ask for verification of your age (including identification) and we may in our absolute discretion refuse entry to the Reindeer and Old Vol and refuse to sell alcoholic beverages.

### **The data we collect from you**

We may collect, use, store and transfer various kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier and date of birth. .
- **Contact Data** includes billing 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 bookings you have made and goods 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 (if applicable).
- **Usage Data** includes information about how you use Our Sites or Our App, and our products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **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 and Financial Data by filling in forms or by corresponding with us by post, phone, email, via Our Sites, Our App or otherwise. This includes personal data you provide when you :
  - make an enquiry with us for a booking, event and/or to buy goods and/or services;
  - order food and beverages from us via our App;
  - enter into a contract with us at either the Reindeer or the Old Vol for a table or event, for the supply of goods and services;
  - request marketing to be sent to you;
  - interact with us on social media; or
  - give us feedback or contact us.

**Please note:** We may also record images of you on our CCTV when you visit the Reindeer and the Old Vol. Your car number plate may also be recorded. We use CCTV for the detection and prevention of crime.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the UK; and

(b) Word Press.

### Use of your information

We will use the data collected about you in the following ways:

- to provide goods and services to you, to perform our contract with you;
- to provide information about our businesses, products or services which may be of interest to you when you have given us consent to contact you for marketing purposes;
- improve the efficiency of Our Sites and Our App;
- to develop goods or services;
- to notify you of changes to our goods or services;
- to understand our customer requirements and preferences, perform analysis and comparisons;
- to administer and update Our Sites and Our App, to ensure it runs smoothly on your hardware;
- to offer you support in the event that you have problem or an issue with Our Sites or Our App;
- to comply with any legal or regulatory obligations we may have for example to HMRC; and
- where it is in our legitimate interest to do so, where we have considered and balanced any potential impact on you. For example, where our insurers have requested that we retain information.

Please see further details in the table below and please also refer to the “Cookies” section.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To deal with your enquiry	(a) Identity (b) Contact	You have given us your consent
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to

(b) Collect and recover money owed to us	(d) Transaction (e) Marketing and Communications	us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms and conditions or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and Our Sites and Our App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (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) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our goods/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics (including Cookies) to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep Our Sites and Our App and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

	(e) Profile (f) Marketing and Communications	Consent.
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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. As referred to above, we will only contact you for marketing purposes where you have given your express consent.

You may withdraw your consent at any time by contacting us at : [admin@oldvolpub.co.uk](mailto:admin@oldvolpub.co.uk)

## Where we store your personal data

- Although the data we collect from you is stored in the European Economic Area ("EEA"), data transferred to third parties to perform our contract with you may be transferred to third parties outside the EEA. By submitting personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.
- As referred to above, all information you provide to us is stored on our secure servers via Word Press.
- In addition, we use SSL (Secure Sockets Layer) technology to encrypt the data on the Our Sites. The parties with whom we share your data to perform our contract with you may have different arrangements in place.
- We take all reasonable technical, organisation and security steps to ensure that the information you supply to us over the internet is secure.

## Data retention

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

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and insurance purposes.

In some circumstances you can ask us to delete your data (please see your legal rights below for further information).

In some circumstances we will 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.

## **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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- 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.

**How to exercise your legal rights:** Please contact us at [admin@oldvolpub.co.uk](mailto:admin@oldvolpub.co.uk) or write to us at our registered office.

### **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 could 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 could 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.

## **Disclosure of your information**

You agree that we have the right to share your Personal Data with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties including:
  - business partners, our couriers, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
  - analytics and search engine providers that assist us in the improvement and optimisation of Our Sites.
- To HMRC, regulators and other authorities.
- To a prospective buyer or seller if we sell or buy any business or assets.
- If any of the shares in RPC are sold or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms of business or terms of use, and other agreements; or to protect the rights, property, or safety of RPC, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud detection and credit risk reduction.

## **Cookies**

All Cookies used by RPC on Our Sites are used in accordance with current Cookie Law. We may use some or all of the following types of Cookie:

- Strictly Necessary Cookies (SNC) - a Cookie falls into this category if it is essential to the operation of Our Sites, supporting functions such as logging in.
- Analytics and Flash Cookies (AFC) - it is important for RPC to understand how you use Our Sites. For example, how efficiently you are able to navigate around it, and what features you use. Analytics Cookies enable us to gather this information, helping RPC to improve Our Sites and your experience of it.
- Functionality Cookies (FC) - enable us to provide additional functions to you on Our Sites such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.

- Persistent Cookies (PC) - any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Sites.
- Session Cookies (SC) - any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only remain on your computer or device from the point at which you visit Our Sites until you close your browser. Session Cookies are not deleted when you close your browser, to delete these cookies you will need to clear your browser history.
- Web beacons (WB) - certain pages on Our Sites and e-mails may contain small electronic files known as web beacons. Web beacons permit RPC to monitor the volume of users of Our Sites and the popularity of certain pages.

Before Cookies are placed on your computer or device you will be shown a cookie compliance statement, requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide you with the best possible experiences and services to you. You may wish to deny consent to the placing of the Cookies at which point we request you cease using Our Sites.

In addition to the controls that RPC provide, you can choose to enable or disable Cookies and the web beacons referred to above in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please access the help menu in your internet browser.

We have set out details of Cookies so that you can see what external tools we are using, who provides these tools, what kind of data in form of cookies they are collecting, how long this data is held and who has access to this data:

### ***Essential Cookies, Functionality Cookies and Session Cookies***

- **wordpress\_logged\_in\_[hash]**: to indicate when you are logged in, and who you are. This cookie is maintained on the front-end of the website as well when logged in.
- **wordpress\_test\_cookie**: to check if the cookies are enabled on the browser to provide appropriate user experience to the users. This cookie is used on the front-end, even if you are not logged in.
- **wp-settings-{time}-[UID]**: to customize the view of your admin interface and the front-end of the website. The value represented by **[UID]** is the individual user ID of the user as given to them in the users' database table.

These cookies are strictly necessary without which the website will not function properly. you do not require any consent from users who visit Our Sites.

### ***Persistent Cookies***

They expire in almost a year after loading on the visitor's system.

- **comment\_author\_[hash]**: remembers the value entered into the comment form's name field.
- **comment\_author\_email\_[hash]**: remembers the value entered into the comment form's email field.
- **comment\_author\_url\_[hash]**: remembers the value entered into the comment form's URL field.

Commenters cookie is only activated if the users give their consent to save the details.

A list of Google Analytics Cookies can be viewed via the following link:

<https://business.safety.google/adscookies/>

The optional cookies can be deactivated via our cookie settings.

You can also prevent the use of any cookies by the settings of your browser. However, this could affect the service functions and block also technically necessary cookies.

### **External Web Services and Links**

We use a number of external web services on Our Sites to display content within our web pages. If you make a booking with us, you will also be re-directed to Res Diary which is a third party application. Your use of Res Diary will be subject to their terms and conditions which can be accessed via the following link: <https://www.resdiary.com/Terms>

This is not an exhaustive or complete list of the services we may use, or might use in the future, when embedding content, but these are the most common. We cannot prevent these third-party sites, or external domains, from collecting information on your usage of this embedded content. If you are not logged in to these external services then they will not know who you are but are likely to gather anonymous usage information e.g. number of views, plays, loads and so on.

### **Email tracking**

Some emails that we send may have tracking on so that we can tell how much traffic those emails send to Our Sites.