



T(n)S Catering Management Ltd Privacy Policy

T(n)S Catering Management Ltd is committed to protecting the privacy of our users and customers. This Privacy Policy is intended to inform you on how we gather, define and utilise your information.

It applies to information collected by us, or provided by you, whether in one of our units, by emails, letters, texts, through our website and or our Social Media (WSSM) or in any other way such as over the phone. It is also intended to assist you in making informed decisions when using our website, our products and services and or working with us. Please take a minute to read and understand the Policy.

All your personal information shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. If you want to know what information we collect and hold about you, or to exercise any of your rights as set out in the section below, please write to us at the below address or via email at info@tnscatering.co.uk.

FAO: GDPR Representative, T(n)S Catering Management Ltd, Perseus House, 3 Chapel Court, Holly Walk, Leamington Spa, Warwickshire, CV32 4YS

T(n)S Catering Management Ltd is the controller of your information for the purposes of the GDPR and is a Company registered under number 4811572 and whose VAT number is 808043939.



1.0 The data we collect about you

Personal data, or personal identification 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 when we obtain that data and during the course of any relationship we might have with you. We have grouped the different types of data together as follows:

- **Identity Data** - Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** - Includes such things as billing address, delivery address, email address and telephone numbers.
- **Financial Data** - Includes bank account and payment card details where this type of data is relevant to the reason underlying our relationship (usually so we are able to provide you with products and services).
- **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, 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 any of our websites.
- **Profile Data** - Includes your username and password (in those circumstances where you might have a technological relationship with us through a smartphone or computer), purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** - Includes information about how you use our websites and purchase our products and services.
- **Marketing and Communications Data** - Includes your preferences in receiving marketing from us and our third parties and your communication preferences. You will not be contacted for marketing purposes unless you have given us your express consent to do so.

2.0 How we might collect the data

- By supplying us with the Information as listed above, on an individual basis by registering as a user or subscribing to receive updates or offers from us. To become a registered user you must provide us with your name & email address
- By corresponding with us by email, in which case we may retain the content of your email messages together with your email address & our responses
- Applying for a job with us
- Being an employee and all personal data as required to facilitate employment with the organisation
- By working with us as a supplier or any other type of third party organisation supplying a service to or for us.
- By working with us as and using our services as a client.
- Through any preferences & areas of interest as advised by you on subscribing to any of our online services
- By Information provided when you use our mobile optimised website from your portable hand-held device, including details of your physical location, where you have agreed to it being used.



3.0 What Information do we collect on our Loyalty Card Scheme?

When using our Loyalty Card, you may provide us with:

- Your name & contact details (email address & name)
- Further information as applicable and made available by you

4.0 What Information do we collect in our restaurants or elsewhere?

When you are in one of our restaurants, we may collect the following Information when you use the Wi-Fi service: your name, email address & phone number.

We may collect Information about your computer, including, where available, your IP address, operating system, browser type & the geographical location of your computer, for system administration purposes.

When our WSSM (including the mobile optimised version of the website accessible from your portable hand-held device) you may provide us with personal information such as name, postcode, email address & mobile phone number ("Information"). You may provide us with Information in a number of ways

5.0 How we use your Information

We will hold, use & disclose your Information for our legitimate business purposes including:

- To keep you up to date about important changes to our business
- To direct-market products & services, advise you of news & industry updates, events, promotions & other information. Before we do so, you will be given an option to opt-out of such communications and an option to unsubscribe will also be provided with each communication
- To apply profiling technology which analyses our customers' engagement with our direct marketing communications, activity and interests so that we can send you content that is relevant to you
- To answer your queries
- To release Information to regulatory or law enforcement agencies if we are required or permitted to do so
- To comply with any updated legislation that may apply

We do not collect any Special Categories of Personal Data about you through most of the standard ways in which we might collect your data. 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.

However, we might collect Special Categories of Personal Data in specific circumstances where that type of data will be relevant for those circumstances. You will be advised at the time of us seeking to collect that Special Category data and we will explain exactly why we need it.



6.0 The legal basis for processing your Information

Under GDPR, the main grounds that we rely upon in order to process your information are the following:

- Necessary for compliance with a legal obligation. We are subject to certain legal obligations which may require us to process your Information. We may also be obliged by law to disclose your Information to a regulatory body or law enforcement agency
- Necessary for the purposes of legitimate interests. Either we, or a third party, will need to process your Information for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights & freedoms, including your right to have your Information protected. Our legitimate interests include responding to requests & enquiries from you or a third party, optimising our website & customer experience, informing you about our products & services & ensuring that our operations are conducted in an appropriate & efficient manner
- Consent. In some circumstances, we may ask for your consent to process your Information in a particular way.

7.0 How we share your Information

In certain circumstances we will share your Information with other parties. Details of those parties are set out below along with the reasons for sharing it:

- **Trusted third parties** - In order to provide certain services, we will share your information with third party service providers such as IT infrastructure companies & email logistics providers. We will not share your data with any third party where it is not necessary to do so to provide a service to you.
- **Regulatory & law enforcement agencies** - As noted above, if we receive a request from a regulatory body or law enforcement agency, & if permitted under GDPR & other laws, we may disclose certain personal information to such bodies or agencies.
- **New business owners** - If our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company & their advisors. If this happens, you will be sent notice of such event.

8.0 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 strictly to those employees, agents, contractors and other third parties who have a need to know that data in order to further the transaction in which we are both concerned. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.



9.0 How long we retain your information for

We will only retain your Information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data & the purposes for which it is kept. For example, if we receive your Information through a competition entry, we will retain your data for as long as is necessary to administer the competition. If we receive your Information when you apply for a job, we will retain your data for as long as is necessary to process your application & maintain application statistics. If we receive your information when you start to do business with us we will retain your data for as long as is necessary to continue our working relationship, whether current, continuing or after any working relationship has ceased. In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation, or for fraud detection purposes.

10.0 Your rights relating to your information

You have certain rights in relation to personal information (Subject Access Request - SAR) we hold about you. Details of these rights & how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

- **Right of Access.** You have the right at any time to ask us for a copy of the Information about you that we hold and to confirm the nature of the Information & how it is used. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so. A SAR should be made in writing to address above and include:
 - Full name
 - DOB
 - National Insurance number and current address
 - What type of information you require
 - Copies of back page of your Passport or driving license

We'll comply with your request in a timely manner and within the legal requirements of the legislation.

- **Right of Correction or Completion** - If Information we hold about you is not accurate, or is out of date or incomplete, & requires amendment or correction you have a right to have the data rectified, updated or completed. You can let us know by contacting us at the address or email address set out above
- **Right of Erasure** - In certain circumstances, you have the right to request that Information we hold about you is erased, e.g. if the Information is no longer necessary for the purposes for which it was collected or processed or our processing of the Information is based on your consent & there are no other legal grounds on which we may process the Information
- **Right to Object to or Restrict Processing** - In certain circumstances, you have the right to object to our processing of your Information by contacting us at the address or email address set out above. For example, if we are processing your Information on the basis of our legitimate interests & there are no compelling legitimate grounds for our processing which override your rights & interests. You also have the right to object to use of your Information for direct marketing purposes.



You may also have the right to restrict our use of your Information, such as in circumstances where you have challenged the accuracy of the Information & during the period where we are verifying its accuracy.

- **Right of Data Portability** - In certain instances, you have a right to receive any Information that we hold about you in a structured, commonly used & machine-readable format. You can ask us to transmit that Information to you or directly to a third-party organisation. This right exists in respect of Information that you have provided to us previously & is processed by us using automated means. While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third-party organisation's systems. We are also unable to comply with requests that relate to Information of others without their consent.

You can exercise any of the above rights by contacting us at the address or email address set out above. You can exercise your rights free of charge.

Most of the above rights are subject to limitations & exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

11.0 Consent

To the extent that we are processing your Information based on your consent, you have the right to withdraw your consent at any time. You can do this by unsubscribing via the link provided in any direct marketing communication or contacting us at the address or email address set out above.

12.0 Cookies

Similar to other commercial websites, our website may use a technology called "cookies" & web server logs to collect information about how our website is used. A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies.

Information gathered through cookies & web server logs may include the date & time of visits, the pages viewed, time spent at our website, & the websites visited just before & just after our website.

Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our website & which parts of the website are most popular. This helps us gather feedback so that we can improve our website & better serve our customers. Cookies do not allow us to gather any personal Information about you & we do not generally store any personal Information that you provided to us in your cookies.

We may use 'session' cookies which enable you to carry information across pages of the website & avoid having to re-enter information. Session cookies enable us to compile statistics that help us to understand how the website is being used & to improve its structure.



13.0 Changes to our Privacy Policy

This privacy policy can be changed by us at any time. If we change our privacy policy in the future, we will advise you of material changes or updates to our privacy policy by email, where we are holding your email address.

14.0 Complaints

If you are unhappy about our use of your Information, you can contact us at the address or email address above. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF