

BRONZEMARCH TRADING LIMITED

PRIVACY AND COOKIES POLICY

Bronzemarch Trading Limited ("**We**", "**Us**") is committed to protecting and respecting your privacy. This Privacy and Cookies Policy ("**Policy**") (together with and any other documents referred to therein) sets out the basis on which the personal data collected from you, or that you provide to Us will be processed by Us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation ("**GDPR**") and any national legislation that may be enforced from time to time (collectively the "**Data Protection Laws**") the Data Controller is Bronzemarch Trading Limited, also trading as Hare and Tortoise.

YOUR PERSONAL INFORMATION

Information we collect from you

We collect and process some or all of the following types of information from you in the course of your use of the website www.hareandtortoise.co.uk ("**Website**") or providing our services:

- Information that you provide by filling in the Newsletter form on the Website. This includes information provided at the time of registering to use the Website, subscribing to our newsletter, or requesting further information or service. We may also ask you for information when you report a problem with the Website.
- Specifically, personal details such as name, email address, date of birth or any information input by when using the Website.
- If you contact Us, We may keep a record of that correspondence and any personal data you provide within this correspondence.
- We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.

Where you make a booking reservation via the phone or Website, the provision of your title, email address, home or work address, billing information (for deposits), credit card information and dietary information telephone number are required from you to enable Us to confirm a booking.

We will inform you at the point of collecting information from you, whether you are required to provide the information to Us.

Information We Collect From Other Sources

Where you make a reservation online and/or use our click-and-collect service will also obtain and receive personal data from other sources as follows:

- Title, first name, surname, mobile number and e-mail address from RestaurantDiary.com Limited in relation to online reservations
- First name, surname, e-mail address and phone number from Tasty Tech Limited, trading as OrderSwift in relation to click-and-collect services.

USES MADE OF YOUR INFORMATION

Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are to provide you with our services; to enable you to make bookings at our restaurants; and to fulfil your online orders.

Where you have indicated that you wish to sign up to our newsletter and/or receive marketing correspondence from Us, we rely on your consent as the lawful basis on which we collect and use your personal data to provide you with such information.

We also rely on your consent as the lawful basis where you have agreed to participate in a survey, and for the processing of such personal information as has been collected through that survey. You may withdraw your consent at any time by following the steps below.

Purposes of processing

We use information held about you in the following ways:

- To provide you with our services.
- To make bookings and fulfil your orders.
- To ensure that content on the Website is presented in the most effective manner for you and for the device(s) you use to access and view the Website.
- To provide you with information and offers that you request from Us or which We feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and Us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service and improve our services based on any feedback.
- To enforce or apply our Booking Policy as available at <http://www.hareandtortoise.co.uk/booking-policy>.

Marketing

In addition to the above uses We may use your information, to notify you about goods or services which may be of interest to you. Where We do this, We will contact you by electronic means (e-mail or SMS) only if you have consented to such communication (e.g. through signing up to our Newsletter). If you subsequently want Us to cease using your data in this way please either (i) unsubscribe from our electronic communications using the method indicated in the relevant communication or on our website; or (ii) inform Us at any time by contacting Us at the contact details set out below.

We will not sell, distribute, or lease your personal information to third parties.

DISCLOSURE OF YOUR INFORMATION

We routinely disclose your personal data to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (including but not limited to hosting our servers, making reservations at our restaurants

including payment processing for deposits, organising click-and-collect services, sending out promotional materials and offers)

We may disclose your personal data to any member of our corporate group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (where applicable).

We may also disclose your personal data 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; or
- if We or substantially all of our assets are acquired by a third party, in which case personal data held by Us about our customers will be one of the transferred assets; or
- if We are under a duty to disclose or share your personal data in order to comply with any legal or contractual obligation, or in order to enforce or apply our Booking Policy as available at <http://www.hareandtortoise.co.uk/booking-policy>; or
- to protect Our rights, property, or safety or that of our affiliated entities and our users and any third party We interact with the to provide the Website; or
- in relation to selected third parties only, only to the extent that you have consented to such selected third parties notifying you about certain goods or services, which may be of interest to you.

Other than as set out above, and save insofar as is necessary in order for Us to carry out our obligations arising from any contracts entered into between you and Us, We will not share your data with third parties unless We have procured your express consent to do so.

STORING YOUR PERSONAL DATA

Security

We take appropriate measures to ensure that any personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. Where We process payment transactions, these will be encrypted using SSL technology.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

Keeping your personal data up to date

If your personal details change you may update them by contacting Us using the contact details below. If you have any questions about how We use data collected which relates to you, please contact Us by sending a request by email to the contact details below.

We will endeavour to update your personal data within seven (7) working days of any new or updated personal data being provided to Us, in order to ensure that the personal data We hold about you is as accurate and up to date as possible.

How long we keep your personal data

We will store the personal information that you have provided us for as long as it is reasonably necessary taking into consideration our purposes for processing your data including to provide you with our services and marketing materials, to resolve any disputes, enforce our rights and/or respond to queries.

If you have any questions about our data retention policy please contact us.

Where we store your personal data

All information We hold about you is processed and stored on our supplier's secure servers within the EEA.

YOUR RIGHTS

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Policy is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to Us
- let Us have enough information to identify you (eg name, contact number and order number),
- let Us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let Us know the information to which your request relates, including any account or reference numbers, if you have them.

HOW TO COMPLAIN

We hope that We can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work,

normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Policy at any time. Any changes We may make to our Policy in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy policy.

INFORMATION ABOUT OUR USE OF COOKIES

We may collect information about your mobile phone, computer or other device from which you access the Website including, where available your IP address, operating system and browser type, for systems administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may, however, use such information in conjunction with the data We have about you in order to track your usage of our services.

Our Website uses cookies to distinguish you from other users of our Website. This helps Us to provide you with a good experience when you browse our Website and also allows Us to improve the Website. By using our Website you agree to our use of cookies as more specifically set out below.

A cookie is a small file of letters and numbers that We store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies We use include:

- **“Analytical”** cookies. They allow Us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps Us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- **“Strictly necessary”** cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
- **“Functionality”** cookies. These are used to recognise you when you return to our Website. This enables Us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **“Targeting”** cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed to our affiliates websites. We will use this information to make our Website, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

The Website 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 terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites. Please note that third parties affiliates may also use cookies, over which We have no control.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our Website.

CONTACT

All questions, comments and requests regarding this Privacy and Cookies Policy should be addressed to info@hareandtortoise.com write to Us at 296-298 Upper Richmond Road, London SW15 6TH .