

Welcome to the Golden Brick Pubs Limited website! Here is our privacy policy.

## 1. Introduction

As you know we love to share and we want to keep on sharing with you. Most importantly though, we want to reassure you that this will never be too often and we'll only ever share the good things! We understand how important it is that your data is protected and that people can't just give it out willynilly! The Privacy Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe. Hopefully this will answer any questions you may have but if not please feel free to get in touch at any time. We will always keep the most up to date version of our privacy policy on our website, so you are welcome to refer to it at any time.

Golden Brick Pubs Limited is the controller and is responsible for your personal data. For simplicity throughout this notice, 'we' and 'us' means Golden Brick Pubs Limited.

## 2. Contact Us

Our full details are: Golden Brick Pubs Limited a company registered in England with company number 11573621 whose registered office is C/O Union, 88-90 George St, London, W1U 8PA.

Email address: [headoffice@gbpubs.com](mailto:headoffice@gbpubs.com)

You have the right to make a complaint at any time to the Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). You can contact them by calling **0303 123 1113**. We would appreciate though, that before contacting anyone else you give us the opportunity to help with any of your concerns.

## 3. Consent

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data.

In specific situations, we can collect and process your data with your consent.

*For example, when you tick a box to receive email newsletters.*

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what might be of interest to you. This is how we decide which products services and offers may be relevant to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you have provided us with your details when you entered a competition or registered for a promotion and in each case you have not opted out of receiving that marketing.

#### **4. How data is collected**

- When you engage with us on social media.
- When you download or install one of our apps.
- When you join a loyalty programme.
- When you contact us by any means with queries, complaints etc.
- When you ask one of our venues to email you information about a product or service.
- When you enter prize draws or competitions.
- When you make a reservation with us or book to attend an event.
- When you fill in any forms. For example, if an accident happens in a venue, an employee may collect your personal data.
- When you've given a third-party permission to share with us the information they hold about you.
- We collect data from publicly available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law.

#### **5. The data we collect about you**

- If you are a member of our Community: your name, date of birth, and email.
- Payment card information.
- Your comments and reviews.
- Your image may be recorded on CCTV when you visit a venue.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

#### **6. Data Security**

We know how much data security matters so with this in mind we wish to ensure that your data will be treated with the utmost care and all appropriate steps will be taken to protect it to ensure it can't be accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Access to your personal data is password-protected, and sensitive data (such as payment card information) is protected.

We regularly monitor our system for possible vulnerabilities and attacks and we have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If we need to use your personal data for an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

## **7. How long we keep your personal data**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected including for the purposes of satisfying any legal accounting or reporting requirements.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## **8. Sharing your personal data**

We sometimes share your personal data with trusted third parties.

For example, to handle complaints.

### **Here's the policy we apply to those organisations to keep your data safe and protect your privacy:**

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

### **Examples of the kind of third parties we work with are:**

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on your marketing consent. We do not use cookies on our Golden Brick Pubs Limited website.
- Data insight companies to ensure your details are up to date and accurate.

## **Sharing your data with third parties for their own purposes:**

We will only do this in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.

*For example, if you enter a competition and tick a box agreeing that the company responsible for the prize can send you promotional information directly as we are running the competition in tandem and you agree to receive direct communications from them.*

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

We may, from time to time, expand, reduce or sell Golden Brick Pubs Limited and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information please contact our Data Protection Officer

Email address: [headoffice@gbpubs.com](mailto:headoffice@gbpubs.com)

To help personalise your journey with us we currently use the following companies who will process your personal data as part of their contracts with us:

- Design My Night
- Mail Chimp
- SureFoot
- Wi-Fi Providers
- Google
- Twitter
- Yahoo
- Pinterest
- Instagram
- YouTube
- Facebook

## **9. Your rights over personal data**

An overview of your different rights. You have the right to request:

- Access to the personal data we hold about you.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please contact The Data Protection Officer, Email address: [headoffice@gbpubs.com](mailto:headoffice@gbpubs.com) or in writing C/O Union, 88-90 George St, London, W1U 8PA.

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 may refuse to comply with your request in these circumstances. If we choose not to action your request we will explain to you the reasons for our refusal.

To ask for your information to be amended please update your online account or contact a member of our sales and marketing team. Email address: [headoffice@gbpubs.com](mailto:headoffice@gbpubs.com)

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 also may contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

To stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division.
- In our apps, you can manage your preferences and opt out from one or all of the different push notifications by selecting or deselecting the relevant options in the 'Settings' section.
- Write to Golden Brick Pubs Limited, C/O Union, 88-90 George St, London, W1U 8PA.

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

### **1. How we use your personal data**

When you purchase a product or service from Golden Brick Pubs Limited, we might receive a copy of the information you supplied. If you agree to receive marketing communications from us, we will use your data to personalise what we send you. You are free to opt out of receiving marketing communications from us at any time.

### **2. How our providers use your personal data**

When you then apply for a product or service from one of our chosen providers, your data will be collected and used by them under the terms of their own separate privacy policies. Please note we can't be responsible for the content of external websites.

### **3. Joint use of your personal data**

We will only share data with our providers to bring you relevant offers, updates, products and services, and discounts that reward your loyalty to our brand.

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us on [headoffice@gbpubs.com](mailto:headoffice@gbpubs.com)
- Or write to us at Golden Brick Pubs Limited, C/O Union, 88-90 George St, London, W1U 8PA.

## **Terms & Conditions:**

### **1. Customer Safety**

Golden Brick Pubs Limited operate a zero tolerance policy on illegal drugs. Customers in possession of illegal drugs will have the drugs seized immediately and the Police will be informed.