## **Better Buffets Privacy Policy**

#### Last updated: 13/05/18

#### Introduction

This document explains how we (Better Buffets Limited) collect, store and use information from you and how we will protect your privacy rights.

#### 1. Who we are

We are Better Buffets Limited, registered at Threshyburn Farm, Lochend Toll, Dunfermline, KY12 0SE

#### 2. About this Privacy Policy

2.1 We are committed to protecting and respecting your privacy. This privacy policy (together with any applicable legal documents for the Services) sets out the basis on which we will process information we collect from you or that you provide to us. This may include Personal Information (meaning information which, on its own or in combination with other information, can be used to identify you, including your name, email address, home address and telephone number, and non-personal information. In general, we will only collect the personal information we need from you, in order to offer you our Services and to comply with our legal and regulatory obligations.

#### 3. Information which we collect

- 3.1 The information we collect about you can include information which, on its own or together with other information, can be used to identify you as an individual. We also collect other information which does not personally identify you. All of this can include:
  - a. Your name;
  - b. Your date of birth
  - c. Your home address
  - d. Your email address;
  - e. Any other information with which you supply us via the Services (and for the avoidance of doubt this may include collection of non-personally identifiable information
  - f. Details of your use of our Services including, but not limited to: metrics information about when and how you use the Services; traffic data; certain information from third party services such as social networks, strictly in accordance with the applicable networks' terms and conditions (and with your prior explicit consent) and your geographical location data;
  - g. Other personal or business information you give us in order to help you with any queries or support matters via our forums or customer support service.

#### 4. How we collect information:

We may collect and process information about you through the following means: (1) information that we collect via any of our Services; (2) information given when you contact us. We may collect this information via our Services or third party services connected with them.

### 5. Cookies and other tracking technologies

We use technologies on our website to collect information that helps us improve your online experience. We refer to these technologies, which include cookies, collectively as "cookies." This policy explains the different types of cookies used on the Services and how you can control them.

We hope that this policy helps you understand and feel more confident about our use of cookies. If you have any further queries, please contact us at info@betterbuffets.co.uk.

## What is a Cookie?

Cookies are small text files that are stored on your computer or mobile device. They are widely used in order to make websites or other online services work or to be better or more efficient. They can do this because websites and other online services can read and write these files, enabling them to recognise you and remember important information that will make your use of them more convenient (e.g. by remembering your user preferences).

#### What Cookies do we use?

The cookies we use are essential to the operation of our service. These cookies include Google Analytics cookies, and cookies to facilitate our contact form. They are all short term cookies, lasting no longer than two days.

#### 6. Where and how we store your personal information

6.1 The information that we collect from you may be transferred to, stored and processed at a destination outside the European Economic Area. This includes, but is not limited to UK, EU and USA. By submitting your personal information, you agree to this transfer, storing or processing. Where we transfer your personal data outside of the EEA, we will put in place adequate measures to ensure that your Personal Information is kept secure.

6.2 All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our servers via any of our Services; 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.

## 7. Uses made of your information

7.1 In accordance with data protection laws, we will only process your Personal Information where we have a lawful basis for doing so. In respect of your Personal Information, this includes: (i) where it is necessary to provide services to you under the performance of the contract we have with you; (ii) where we are required to do so in accordance with legal or regulatory obligations; (iii) where you have given your consent; and, (iv) where it is in our legitimate interests to process your Personal Information, provided that none of these prejudice your own rights, freedoms and interests.

7.2 The following are a list of the "Purposes" for which we (including any of our agents, group members, sub-contractors and/or employees) process your Personal Information, and the lawful basis on which we carry out such processing:

Purpose	Lawful Basis
To set-up, administer and manage your account and records	Necessary for the performance of a contract
To provide and personalise our Services	Legitimate interests to provide to our Customers the best possible experience in using our Services
To receive and respond to your communications and requests	Necessary for the performance of a contract where such communication relates specifically to our Services, otherwise consent
To notify you about updates to our menus and Services	Necessary for the performance of a contract
To ensure that we are able to fulfil our regulatory obligations regarding your account, including by verifying the accuracy of any information you provide us	Necessary to comply with a legal or regulatory obligation
To improve or modify the Services, for example based on how you use our Services;	Legitimate interests so we can understand the use of, and therefore improve, our websites and Services.

#### 8. Sharing your information with third parties

8.1 We may, for the Purposes specified above, disclose your Personal Information to any of the following recipients:

8.1.1. any company which assists us in directly providing services to your address, to facilitate delivery;

8.1.2. any third party which assists us in providing our Services, including (but not limited to) payment processors;

8.1.3. any third party which can assist us in verifying the accuracy of your Personal Information,

8.1.4. any regulatory body or authorised entity which may have any reasonable requirement to access your Personal Information; and

8.1.5. any potential purchaser of our business or any investors in it or in any company within our group (including in the event of insolvency)

8.2 If at any time you wish us to stop processing your Personal Information for the above Purposes, you should contact us and we will take the appropriate steps to stop doing so. Please note that this may mean that your account will be closed.

8.3 We may share your non-personal information with third party partners who work with us to provide the Services to you in order to support, improve or amend any Services. We may also share your non-personal information with data analysis services.

8.4 We will not share your information with third party advertisers except with your consent.

8.5 We do not disclose Personal Information about identifiable individuals to advertisers,

# 9 Marketing Preferences

9.1 Neither we nor any company in our group will send you unsolicited information regarding any third party's products or services.

9.2 Unless you have informed us that you wish to receive promotional information and emails, we will not send you such communications.

9.3 Unless you have informed us that you do not wish to receive operational information, we will send you such communications, until you inform us that you no longer wish to receive them.

# 10 Your rights

10.1 You have the following rights in relation to your Personal Information:

10.1.1 a right to access your Personal Information as held by us;

10.1.2 a right to receive certain Personal Information in machine-readable format;

10.1.3 a right to object to processing where the lawful basis is that it is in our legitimate interests, but please note that we may still process your Personal Information where there are other relevant lawful bases or where we have compelling grounds to continue processing your Personal Information in our interests which are not overridden by your rights, interests or freedoms;

10.1.4 a right to have inaccurate Personal Information rectified;

10.1.5 a right to have certain Personal Information erased where it is no longer necessary for us to process it, where you have withdrawn your consent pursuant to paragraph 10.1.8, where you have objected pursuant to paragraph 10.1.3, where your Personal Information has been unlawfully processed, or where erasing your Personal Information is required in accordance with a legal obligation;

10.1.6 a right to request an explanation of the logic involved where we make decisions about you solely through automated means;

10.1.7 a right to complain to your national data protection regulator;

10.1.8 where we have specifically requested your consent to process your Personal Information and have no other lawful conditions to rely on, you have the right to withdraw this consent; and

10.1.9 a right to object to direct marketing, which can be done by opting-out of direct marketing either through your account or by opting out via the communication itself. You also have a right to object to any profiling to the extent that it relates to direct marketing only.

10.2 If you are unsure about your rights or are concerned about how your Personal Information may be processed, you should contact your national data protection regulator.

10.3 If you would like to exercise any of your rights then you can do so by contacting us as at <u>info@betterbuffets.co.uk</u> Please be aware that while we will try to accommodate any request you make in respect of your rights, they are not absolute rights. This means that we may have to refuse your request or may only be able to comply with it in part.

10.4 Where you make a request in respect of your rights we will require proof of identification. We may also ask that you clarify your request. If we receive repeated requests, or have reason to believe requests are being made unreasonably, we reserve the right not to respond.

#### **10. Retention of your Personal Information**

We will retain your Personal Information for the period necessary for us to provide you with our Services. Accordingly, your Personal Information might be retained for up to 3 years. However, in certain cases we may be obliged to retain your Personal Information for up to 9 years. If you have any questions, please contact us at <u>info@betterbuffets.co.uk</u>. Where it is no longer necessary for us to process your Personal Information, we will delete it. Please note, however, that we may be subject to legal and regulatory requirements to keep personal data for a longer period, in particular pursuant to any applicable statutory limitation period.

### 11. Security

15.1 We use a number of methods to ensure that all customer information remains confidential. Transferred information is sent using advanced encryption methods and, once stored in our servers, is protected by the most up-to-date firewall technology available to protect data from being misused and/or lost.

### **12.** Changes to our privacy policy

We may change this privacy policy at any time: please take a look at the "LAST UPDATED" date at the top of this page to see when this privacy policy was last revised. Any amendments to this privacy policy will come into effect a reasonable period of time after this "LAST UPDATED" date (normally we consider 30 days to be a reasonable time period) unless you contact us before that date to discuss or query any of the amendments.

#### 13. Contact us

We welcome any questions, comments and requests regarding this privacy policy, which should be addressed to <u>info@betterbuffets.co.uk</u>.