

# SPRING

## Privacy Policy

Heckfield Catering Limited t/a Spring (“Spring”, “we”, “us” or “our”) respects your privacy and is committed to protecting your personal data. This privacy policy (the “Policy”) will inform you as to how we look after your personal data when you visit our Spring website located at <http://springrestaurant.co.uk/> (the ‘Website’) regardless of where you visit it from.

This Policy aims to give you information on how Spring collects and processes your personal data through your use of our Website, including any data you may provide through our Website, when you make a reservation or use a booking service, sign up to our newsletter, purchase a product, voucher or ticket, take part in a competition or otherwise communicate with us.

Our Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Amendments and updates to this Policy may be made from time to time. Any revisions will be posted on this page, so you will always be aware of what information we collect and how we use that information. Please review this page regularly so that you are aware of any changes.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

For the purposes of data protection laws, Heckfield Catering Limited, a company registered in England and Wales with number 07205404, whose registered address is at St Bride’s House, 10 Salisbury Square, London, EC4Y 8EH is the controller and responsible for the Website.

We have a privacy manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below:

Full name of legal entity: Heckfield Catering Limited

Email address: [data@springrestaurant.co.uk](mailto:data@springrestaurant.co.uk)

Postal address: Heckfield Catering Limited, Heckfield Place, Heckfield, Hook RG27 0LD

Heckfield Catering Limited is registered with the UK Information Commissioner’s Office (ZA328634).

### 2. CHANGES TO YOUR INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information (e.g. name or address) changes during your relationship with us so that we can update our records.

### **3. THE DATA WE COLLECT ABOUT YOU AND HOW WE COLLECT IT**

“Personal data”, or “personal 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 collect personal data about you when you make a reservation or use a booking service such as OpenTable who will pass to us the information that you input in a booking form, sign up to our newsletter, purchase a product, voucher or ticket, take part in a competition, use our online services including our wifi or interact with us in any other way, including but not limited to social media interactions, attending events, entering competitions, signing up for special offers and/or completing surveys..

We also operate CCTV in and around our premises and may capture your image if you visit our premises.

We may collect, use, store and transfer different kinds of personal data about you which has been provided directly by you and/or via a booking service such as OpenTable. The personal data we collect may include your name, email address, date of birth, birthday, guest information, telephone numbers, dining preferences including any informed dietary requests, dining activity and history, billing address, delivery address, bank account and payment card details, shopping history, IP address, the type of browser you use, your login data, time zone setting and location, browser plug-in types and versions, operating system and platform and any other technology on the devices you use to access the Website, your interests, preferences, feedback and survey responses, your preferences in receiving marketing from us and our third parties and your communication preferences.

When you make a booking with us or visit us, we may collect certain types of Special Categories of personal data also known as “sensitive personal data” which might include health and medical information such as details of allergies and any disabilities. We will only collect such information when you give it to us and we will note this information for your wellbeing.

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. In this case, we may have to cancel a booking, product or service you have ordered from us but we will notify you if this is the case at the time. Where a third party booking provider such as OpenTable provides us with your information they do so as our processor. However, they may also use your information as a controller. We have no liability for any use of your information for which a third party is a controller.

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to and for the purposes set out in this Policy. These are:

- When you give your consent

- When necessary for the performance of a contract we have entered into or are entering into with you
- When necessary to comply with a legal or regulatory obligation
- For our legitimate interests or those of a third party, provided that your interests and fundamental rights and freedoms do not override those interests.

We may use your personal data in the provision and administration of the services that you have requested and/or to respond to your queries. Where you don't provide us with certain information we may be unable to process your order.

We may also use your personal data to meet our legal obligations, to deal with any complaints and for the enforcement of our terms and conditions.

We may use your personal data for our legitimate business interests which include security purposes, improvements to our Website, improvements to our solutions and services and for general marketing purposes including sending direct email marketing communications. We will not do so though where our interests are outweighed by your interests, rights and freedoms.

#### **Purposes for which we will use your personal data**

We have set out below a description of the ways we plan to use your personal data:

- to register you as a new guest;
- to provide a reservation or booking service, including managing payments, fees and charges and collecting and recovering any monies owed to us;
- to manage our relationship with you which will include notifying you about changes to our terms or privacy policy and/or asking you to leave a review or take a survey;
- to link or combine with other information we get from third parties such as OpenTable to help us understand your needs and provide you with a better service;
- to respond to your emails, submissions, questions, comments, requests and complaints and provide customer service.
- to enable you to take part in a prize draw, competition or complete a survey;
- to send you newsletters, to keep you updated on new products or services or other goods or services that may be of interest to you, to let you know about special offers and to invite you to our events. For more information on how we may market to you please see the section of this policy called 'Marketing Communications';

- to administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to deliver relevant website content and advertisements to you and measure or understand the effectiveness of that advertising;
- to use data analytics to improve our Website, products/services, marketing, customer relationships and experiences.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like to have an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our data privacy manager using the details set out above.

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.

## **5. DATA STORAGE – HOW LONG AND WHERE?**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. Where processing is based on your consent, we shall only process your personal data until such time as you withdraw your consent.

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 requirements.

We will take all reasonable steps to ensure that your personal data is treated securely and in accordance with this Policy.

We take reasonable steps to ensure that any third parties hosting our Website and our other services have adequate security measures in place to protect personal data.

When we use your personal data as described in this Policy, this may involve our processors sending your personal data outside the European Economic Area (EEA). We will only transfer your personal data outside the EEA where the organisation receiving the personal data has provided adequate safeguards in accordance with data protection laws. By providing us with your personal data you agree that we may transfer store and process your personal data outside the EEA.

In some circumstances we may 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.

## **6. DISCLOSURES OF YOUR PERSONAL DATA**

We will not sell your personal data and generally do not give your personal data to third parties but there are some exceptions. We may share your personal data in the following ways (as appropriate):

- in order to provide any services requested by you which may involve us sharing your personal data with our authorised partners/sub-processors including a third party booking service;
- with any actual or prospective seller or buyer of our business and/or any assets. Information held by us about our customers and any users will be one of the transferred assets;
- with our group companies, which means our subsidiaries and holding companies and any subsidiary or holding company of the same;
- in order to comply with any legal obligation or as otherwise permitted by law;
- for debt collection purposes;
- for security purposes or to protect our rights or those of a third party;
- in the conduct or defence of legal claims or in order to enforce our terms and conditions; and
- for the purposes of the prevention or detection of offences, and/or the apprehension or prosecution of offenders, we may share any personal data that we collect with the Police, other public or private sector agencies, governmental or representative bodies in accordance with the relevant legislation. This will include public authorities, insurance companies, finance companies and/or other agencies.

## **7. MARKETING COMMUNICATIONS**

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have specifically requested information from us. We may also send marketing communications where otherwise permitted under data protection laws i.e. where you have booked with us, we will send you a newsletter containing news regarding our restaurant. We will give you an opportunity to opt out of receiving marketing communications and we will not send marketing communications to you where you have opted out of receiving these.

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, we may still send you service related communications eg. a booking confirmation.

## **8. 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 to those employees, agents, contractors and other third parties who have a business need to know and access the same. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. 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.

## **9. YOUR LEGAL RIGHTS**

Under data protection law you have the following rights in respect of your personal data:

- to request information regarding the personal data that we hold about you and the source(s) of that information. You can request a copy of any personal data we hold about you. This service is usually free of charge, although we have the right to charge a 'reasonable fee' in some circumstances;
- to request that we rectify any inaccuracies in relation to the personal data we hold;
- in some circumstances, to request the erasure of your personal data or object to the processing of your data;
- to object to any direct marketing;
- in some circumstances, to request that your personal data be transferred to you or a new provider if the data is processed automatically;
- to withdraw consent to us processing your personal data. This will not affect the processing already carried out with your consent; and
- to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner's Office. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you wish to exercise any of the rights set out above, please contact our data privacy manager using the details set out in this policy.

### **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 a person who does not have the right to receive it.

### **Time limit to respond**

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.

## **10. LINKS**

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

When you make a booking on OpenTable you should be aware that OpenTable will use your data for its own purposes and you should review their Privacy Policy.

Last amended 24 May 2018