

# WEB PRIVACY NOTICE

## WHO WE ARE

We are Comptoir Group plc (referred to in this document as We, Us and Our)

Our office address is;  
Comptoir Group  
6th Floor  
Winchester House  
259 - 269 Old Marylebone Road  
London. NW1 5RA

We are registered with the ICO under Registration number ZA077922

## INTRODUCTION

This privacy notice sets out how Comptoir Group plc use the personal information collected through this website and when you visit one of our restaurants.

Throughout this document, where we refer to Data Protection Legislation, we mean the Data Protection Act 2018 (DPA2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. When you are based in the EU, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

We are committed to meeting the requirements of the Data Protection Legislation and we have developed this privacy notice to ensure that you are aware of;

- the personal data we collect about you,
- what we do with your information,
- what we do to keep your information secure, and
- the rights and choices you have over your personal information.

We will only use your information as set out in this Privacy Policy. If we need to use your personal information for any other purpose, we will take steps to tell you and we will update this Privacy Policy.

## THE PERSONAL DATA WE COLLECT

We only collect personal information that we genuinely need and in accordance with the Data Protection Legislation.

The type of personal information that we will collect directly from you when you interact with our online services will include your;

- Name
- Telephone Number
- Email Address

We will also collect additional information that will help us to deal with your query; for example details you decide to share relating to your visit.

We will also collect information about your home address via our delivery partners, please note that Deliveroo, JustEat and Uber Eats are independent controllers so please review their privacy information prior to ordering for delivery.

Payment details will be collected but we do not retain any of your card information, we use our trusted payment service provider to process transactions.

Within our restaurants, we operate video surveillance and therefore when you visit one of our sites, we will capture images of you.

We collect limited technical information about your visit to our site, this helps us to better understand how our customers move around, and interact with, this website.

## **LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA**

We will only ever process your personal data if we have a lawful basis to do so. The lawful bases we rely on are;

- Contract – This is where we process your information to fulfil a contractual arrangement we have made with you.
- Consent – This is where we have asked you to provide permission to process your data for a particular purpose. Please note, if we are relying on your Consent you can withdraw your consent at any time by contacting us or using the opt out link in any emails that we send to you.
- Legitimate Interests - This is where we rely on our interests as a reason for processing, generally this is to provide you with the best products and service in the most secure and appropriate way and to manage our Dealer Network.

## **YOUR RIGHTS**

You have a number of Rights under the Data Protection Legislation. If you would like to exercise any of these rights you can contact us using the contact details in the “Contact Us” Section.

**You rights under the Legislation are –**

### ***The right to be informed about our collection and use of personal data***

You have the right to be informed about the collection and use of your personal data. This Privacy notice gives you this information.

### ***Right to access your personal information***

You have the right to access the personal information that we hold about. This is sometimes termed ‘Subject Access Request’. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 1 month from the point that we are able to confirm your identity. We will ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

### ***Right to correction your personal information***

If any of the personal information we hold about you is inaccurate, incomplete or out of date, you can ask us to correct it.

### ***Right to restrict processing***

You have the right to ask us to restrict the processing of your personal data. For example, this may be because you have issues with the accuracy of the data we hold or the way we have processed your data. The right is not absolute and only applies in certain circumstances.

### ***Right to erasure***

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

### ***Right to portability***

The right to portability gives you the right to receive personal data you have provided to us in a structured, commonly used and machine-readable format. It also gives them you the right to request that a controller transmits this data directly to another controller.

### ***Right to object***

You have the right to object to our processing of some or all of the personal data that we hold about you. This is an absolute right when we use your data for direct marketing but may not apply in other circumstances where we have a compelling reason to do so, e.g., a legal obligation.

### ***For more information about your privacy rights***

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

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

### **We will use your personal information to;**

#### ***Answer any questions that you have or to follow up with you on any enquiries***

If you contact us through email, social media, phone or through our website we will use your information to answer your questions and to correspond with you.

#### ***Fulfil your request***

If you book a table or make an order via our website, we will process your personal data to fulfil your request.

#### ***Manage our relationship with you***

Once you are added as a customer in our systems, we will use your information to

- keep in contact with you about your order,
- notify you of any changes to our terms or this privacy notice.

### ***To ensure the safety of our restaurant, staff and customers***

We operate video surveillance for the purposes of safety and preventing crime.

### ***Manage and improve our business and our interactions with you***

We will use certain personal and technical information to:-

- analyse and understand our consumer base
- understand the effectiveness of our advertising campaigns
- develop new products and services
- secure our network
- investigate and respond to service or security issues
- to administer our website
- to meet our legal and regulatory obligations

### ***To promote our products and services***

If you give us your permission, we will use your information to send you promotional material and Newsletters that we believe will be relevant to you.

You can unsubscribe from these communications at any time using the unsubscribe link in our emails or by contacting us.

## **HOW LONG WE RETAIN YOUR PERSONAL DATA**

We retain a record of your personal information in order to provide you with a high quality and consistent service and to evidence the actions we have taken on your behalf.

In line with the Data Protection Legislation we only keep your personal information for the length of time we need it to

- Deliver our services to you
- Meet our Business needs
- Meet our legal obligations

## **WHO WE MAY SHARE YOUR PERSONAL DATA WITH**

In some circumstances we may need to share your personal data with third parties in order to

- Provide you with the service that you have asked for,
- Meet our legal obligations,
- Run and manage our business,

### **We may share your personal information with;**

- Law Enforcement or other public authorities that require us to release information
- To any organisation where it is necessary for us to establish a legal claim or to defend ourselves against such a claim
- Our Professional advisors including accountants, legal professionals or insurers
- Payment services providers who process payments on our behalf
- Providers of ancillary business support services such as Information Technology, Contacts Centre or Marketing service providers (as processors on our behalf)
- Social media or other online advertising providers (if you are opted in to Marketing)
- Any organisation in the event of the sale, merger, reorganisation, dissolution or disposal of our business. We will inform you of any such transfer or disclosure as required by law.

### **In all cases we**

- only provide the minimum personal information that each party requires to carry out their duties
- only disclose personal information to organisations who we have a contractual relationship with or have an overriding legal requirement to hold the information

## **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

In some instances your personal information may be processed outside the UK and the European Economic Area. For example, some members of our Group are based outside the EEA and we also work with suppliers and partners who may make use of Cloud and /or hosted technologies across multiple geographies and jurisdictions.

If and when this is the case we take steps to ensure there is an appropriate level of security so your personal information is protected in the same way as if it was being used within the UK or the EEA.

Where we need to transfer your data outside the UK or EEA we will use one of the following safeguards:

- The use of standard contractual clauses in contracts for the transfer of personal data to third countries or
- Transfers to a non-EEA country with privacy laws that give the same protection as the EEA.

## **HOW WE PROTECT YOUR PERSONAL DATA**

Data security is of great importance to Us and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure any information that we control

### **At a high level we have put the below measure in place:**

- Limiting access to our buildings to those that we have determined are entitled to be there;
- Implementing access controls to our information technology;
- All our employees and agents who have access to or are involved in the processing of personal information are contractually obliged to protect the confidentiality of personal information;

Our websites may include links to external websites operated by other organisations. They may collect personal information from visitors to their site. We cannot guarantee the content or privacy practices of any external websites and does not accept responsibility for those websites.

## **HOW WE USE COOKIES**

When you first visit our site, you will be asked for your permission for us to use some types of cookies.

We have separated our cookies into four categories

### ***Strictly Necessary Cookies***

These cookies will always be placed.

Strictly Necessary cookies are necessary for our website to operate as son cannot be switched off. The Cookies include those that ensure our site is secure, operates as you would expect and remembers your privacy preferences.

### **Performance Cookies**

With your permission we use Performance Cookies to measure and improve the performance of our site. These cookies help us analyse data about web page traffic and to tailor it to customer needs. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

### **Functional Cookies**

With your permission we use functional cookies that enable this website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

### **Targeting and Advertising Cookies**

With your permission we utilise Third Party Marketing and Advertising Cookies – these cookies are placed by third party marketing companies (such as google) or social media companies (Such as Facebook) and are used to understand the pages that you have visited so relevant advertisements can be shown to you on these platforms and on other websites.

These cookies do not directly store your personal information but can uniquely identify your browser and device.

Cookies help us provide you with a better experience, by enabling us to monitor which pages customers find useful and those which they do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

## **CHANGES TO THIS POLICY**

We may change this Privacy Policy from time to time (for example, if the law changes). If the changes are material we will take steps to inform you.

## **HOW TO CONTACT US**

If you would like to

- exercise one of your rights as set out above,
- have a question or a complaint about this policy, or
- have a question or complaint about the way your personal information is processed

You can get in touch using the details on our Contact Us page.