



PRIVACY POLICY

Who we are

This is the privacy policy of Heartstone Inns Limited, a company registered in England and Wales (company number 06936915) whose registered office is at 1 London Street, Reading, Berkshire, RG1 4QW.

We are committed to protecting and respecting your privacy. This privacy policy explains what personal information we collect and how we will use it.

When do we collect personal information and what personal information do we collect?

We may collect personal information about you as follows:

- If you fill in forms on our website, we will collect your contact details and the other information you provide in the form.
- If you contact us by any other means (e.g. email or telephone), we may keep a record of that contact and the information you provide us at that time.
- If you visit one of our pubs we may collect limited personal information about you, such as details necessary to secure a booking (contact details and any special requirements) and limited personal information as may be necessary to take payment for drinks or food;
- If you are a supplier to us or one of our pubs we may collect limited personal information, such as contact details and transaction information.
- If you ask to join any of our pubs' loyalty schemes, we will collect your name, address, email address, date of birth, contact numbers and time/date of your visits and sales when the loyalty card has been used.
- If you ask to be added to our marketing database, we will collect your name, address, email address and your preferences as to how you would like to receive marketing information. The emails that we send you may contain tracking facilities, which may include the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity and other data relevant to the production of an enhanced user experience.
- If you book to stay in the accommodation at any of our pubs we will collect your name, address email address, date of birth, contact numbers, dates of your intended stay and any special requirements. This information is collected for us by Eviivo Limited (www.eviivo.com). We do not process any payment information that is required to secure a booking, as this is received and processed by Eviivo Limited or a booking agent linked to Eviivo Limited. Payment information for any accommodation stay will be processed by the pub at the time of your visit.
- If you apply for employment or work with us, we will collect a range of information relating to you, details of which will be provided at the time.

Cookies

Our website (www.heartstoneinns.co.uk) and those of our pubs uses Google Analytics. Google Analytics uses cookies to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

You can read Google's privacy policy here for further information: <http://www.google.com/privacy.html>.

Users are advised that if they wish to deny the use and saving of cookies from our website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from our website and its external serving vendors.

Links to other websites and social media

Our website may, from time to time, contain links to other websites which may be of interest to you. If you follow a link, please note that the other website will have its own privacy policy and you should check this before you submit any personal information to that website. We are not responsible for the content of other websites or their use of your personal information.

How do we use your personal information?

- If you visit our website, we will use information about your visit to help us make our website experience as user-friendly for as many visitors as possible on the basis that we have a legitimate interest to do so.
- If you fill in forms on our website, or contact us by any other means, we use the information you provide to respond to your enquiry or contact you on the basis that we have a legitimate interest to do so.
- If you book a table or a room at one of our pubs or visit and make a purchase, we will use the information you provide to carry out our contractual obligations to you, in our legitimate interests (namely making your visit as pleasurable as possible) and to fulfil any legal obligations arising from your instructions. We may also use it to notify you about changes in our organisation on the basis that this is compatible with our original use of your information.
- We will use any supplier personal data collected for the purposes of carrying out our contractual obligations and to fulfil any legal obligations arising from such supply.
- If you ask to join any of our pubs' loyalty schemes, we will use the information provided to process and advise you of any benefits due to you as a result of the purchases you make in our pubs. Your data may also be anonymised and collated to provide an insight into our customer base and their activities.
- If you ask to be added to our marketing database, we will use the information you provide to send you information about special offers and details of events at our pubs in accordance with your stated preferences. Any information obtained via the tracking of marketing emails is used to refine future email campaigns and supply you with more relevant content based around their activity. We will do this on the basis that you have consented to us processing your personal information in this way. You can stop receiving marketing information from us at any time as these communications provide easy ways to unsubscribe or update your preferences.

We will not use your personal information for any purpose not explained in this privacy policy and/or the privacy notices that apply to candidates and our staff members.

Where do we store your personal information and how it is kept secure?

Some of the information you provide to us will be transmitted electronically, e.g. information provided via our website or by email. We would remind you that information transmitted via the internet is not completely secure and although we will do our best to protect any information transmitted in this way, we cannot guarantee its complete security.

We have put in place appropriate security measures to prevent your personal data being accidentally lost, accessed or used in an unauthorised way, altered or disclosed. All information you provide to us is stored on our secure servers located in the European Economic Area. No information you provide to us is transferred to, or stored at, a destination outside the European Economic Area.

Some of the information you provide will also be maintained in paper copy, such as table bookings at our pubs and information relating to stays at pub accommodation.

We limit access to your personal 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.

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.

Who do we share your personal information with?

We may disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal obligation (for example our auditors, our insurers, professional advisers and HMRC) or with your consent.

We may also disclosure your personal information, if you are a member of our of our pubs' loyalty schemes or have signed up to marketing communications, to Petticoat Management Team Limited and to Polaris Elements Limited, who maintain and secure our marketing database. Any such disclosure is in accordance with our legitimate interests, namely maintaining an accurate and secure database of our customers, and Polaris Elements Limited and Petticoat Management Team Limited are committed to compliance with data protection legislation.

We will not transfer your personal data outside the European Economic Area.

How long do we keep your personal information?

We will keep your personal information for the following periods of time, subject to our email data retention policy:

Circumstances in which personal information was provided	How long do we keep it?
Information submitted via website form	12 months
Contact by any other means (e.g. email or telephone), including table bookings	12 months
Information submitted via www.eviivo.com and information regarding pub accommodation booking	Usually 7 years from the conclusion of your stay unless we inform you otherwise
To be added to our marketing database	For the duration of your consent (to be deleted upon consent being withdrawn)
Membership of a loyalty scheme	For the duration of your membership and for 7 years thereafter
In the course of supplying goods or services to us	Usually 7 years unless we inform you otherwise or are required to maintain records for longer in accordance with HMRC rules

Your rights in relation to the personal information we hold

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Contacting us

If you would like to communicate with us about any of the rights mentioned above, or if you have any other queries about the matters mentioned in this privacy policy, please contact us using one of the following options:

- Website: www.heartstoneinns.co.uk
- Mail: contact@heartstoneinns.co.uk
- Post: Heartstone Inns, PO Box 1111, Cheltenham, GL50 9PN

Complaints

You have the right to complain to the Information Commissioner about the way in which we collect and use your personal data: www.ico.org.uk/concerns or telephone 0303 123 1113.

Changes to this privacy policy

This policy is effective from 25 May 2018. We may change this privacy policy from time to time by updating this webpage.