# **HAWORTH OLD POST OFFICE**



**Privacy Policy** 

Date: 01/01/2024 Date for Review: 01/01/2025

#### Introduction

We are committed to ensuring that your privacy is protected, and we understand the need for the protection of all personal information provided by you to us. This Privacy Policy (or Privacy Notice) tells you about the type of personal information we collect, and how it is handled in a safe and responsible way. This policy outlines how we aim to achieve this and includes the type of information collected, how we get your personal information, how it is used and processed, how long we keep it for, who it may be shared with, your Data Protection rights, and how to complain.

#### **About Us**

This Privacy Policy describes how The Old P.O. (Haworth) Ltd, trading as Haworth Old Post Office ("we" or "us" or "our") collects and processes data about individuals.

We are a Private Limited Company (Company Number: 14172130) registered at:

121 Main Street Haworth West Yorkshire BD22 8DP

Email: enquiries@theoldpostofficehaworth.co.uk

Website: www.hawortholdpostoffice.co.uk

Our Data Protection Officer can be contacted by writing to the above address or emailing enquiries@theoldpostofficehaworth.co.uk.

We are listed on the register of data protection fee payers by the Information Commissioner's Office. www.ico.org.uk. Registration reference: ZB617618.

### The type of personal information we collect.

We collect and use many kinds of personal information that you give us, or that we collect to provide our dining experience and customer service. The personal information we may collect about you is listed below so you can see what we may know about you. We currently collect and process the following information:

• Contact details: your title, first name and last name, mobile number, home phone number, email address, home address (for postal gift vouchers) and, in some cases, a company name.

- Age: your date of birth and/or age; this includes personal information relating to a special birthday party, for example.
- Demographic data and preferences: your gender; our booking system also collects geographical data about the general location of our customers (local or out-of-town).
- Communications: what we learn about you from communications and conversations
  between us, including reservations and information necessary to fulfil your special
  requests, feedback, gift cards, a summary of any problem you are experiencing, and any
  other documentation, screenshots or information that would be helpful in resolving an
  issue submitted to our customer support.
- Online usage: usage data about how you use our website, social media platforms and booking system, including your IP address, device type, operating system, browser type, domain names, access times, settings, display name and profile photo if applicable.
- Dietary preferences: details about your dietary preferences, allergies, and other health-related information.
- Financial: your debit/credit card details, billing address, and bank account information. Also, any credit held on our Epos system in the form of gift cards.
- CCTV: information provided through CCTV recordings at our restaurant. A sign announcing that recorded CCTV is in operation is displayed in the entrance to the premises.
- Employee Data: Full name, home address, contact numbers, National Insurance number, date of birth, next-of-kin information and any medical or specific details that you have consented to declare. Past employment details, education, salary history and other relevant details may also be collected.

### Providing personal data belonging to others

If you provide the personal information of anyone other than yourself (e.g. your family members or friends), you are responsible for informing that person that we are collecting their personal information and for ensuring that you have valid permission to provide such personal information to Haworth Old Post Office.

### How we get the personal information and why we have it

Generally, we collect and process your information in the following ways:

- I) Information you give us:
  - a) When you make a reservation online or in person at Haworth Old Post Office.
  - b) When you purchase gift vouchers.
  - c) When you visit or make transactions on our website or on the premises.
  - d) When you respond to our promotions or subscribe to our mailing lists.
  - e) When you communicate with us by telephone, email, via our website or through other communication channels, for example, through social media platforms.
  - f) When you visit our website.
  - g) When we seek information about you and receive your personal data in connection with your relationship with us.
  - h) When you enquire about employment via our website, or by email.

- i) When you send us a CV or an expression of interest in employment either by hand or by post.
- j) When you submit your personal data to us for any other reason, including new employee information (application forms, HMRC New Starter forms, etc.)
- 2) Information we collect automatically when you use our services:
  - a) Payment and transaction.
  - b) Profile and usage; this includes:
    - i) Your IP address.
    - ii) The security details you create and use to connect to our services.
    - iii) Your settings and marketing choices.
- 3) Information we receive from third parties:
  - a) Reservation systems.
  - b) Social networks.
  - c) Family members or friends who provide your personal information to us on your behalf.
- 4) Security:

When your images are captured by us via CCTV cameras while you are within the restaurant, or when photographs or videos of you are taken when you attend events or functions organised by us (with your consent).

### How do we use your personal information?

Our use of your personal data will always have a lawful basis, either because it is necessary to complete a booking or transaction, because you have consented to our use of your personal data (e.g. by subscribing to emails or permitting us to share your reviews, social media posts or other), or because it is in our legitimate interests.

We may require the information outlined in the previous section to understand your needs and provide you with a better service, and for the following reasons:

- Internal record keeping.
- Sending you service emails, messages or phone calls (booking confirmation, pre-order requests, dietary information, changes to our service and post-dining feedback. We may also provide you with information about future services that may be of interest if you have expressed an interest in this).
- Improving our products and services.
- Sending marketing communications if you have opted in to receive them.

We will only process your personal data in line with that which is permitted by the law. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the

specific legal ground we are relying on to process your personal data. Typically, we will process your data on one of the following bases:

• Consent given (e.g. for obtaining feedback, photos and video recordings for marketing purpose). You are able to remove your consent at any time; you can do this by contacting us at enquiries@theoldpostofficehaworth.co.uk, or by writing to us at:

The Old P.O. (Haworth) Ltd.

Haworth Old Post Office

121 Main Street

Haworth

West Yorkshire

**BD22 8DP** 

- Performance of a contract or an agreement with you. This includes managing our relationship with, and communicating with you, and processing payments, including offsite purchase of gift vouchers.
- Necessary for our legitimate interests (e.g use of CCTV on site, for internal training, accounting and auditing, IT and website updates).
- Necessary to comply with a legal obligation (e.g. if requested by authority for investigation, to enforce legal rights and to deal with requests from you to exercise your rights under data protection).

### How we store your personal information

Your information is securely stored. Only authorised staff members have access to personal data; Epos system (including details of payments, customers, gift card recipients) and the booking system are password protected. Passwords are changed periodically, and when a member of staff with a knowledge of the password leaves the company.

# How long do we keep your personal information for?

We will keep your personal information for as long as is necessary for us to use your information for the purposes described above in the section above about "How do we use your personal information". We may keep your data for up to 3 years after your last interaction with us. The reasons we may do this are:

- To respond to a question or complaint, or to demonstrate how we have dealt with similar questions or complaints in the past.
- To study customer and sales data as part of our own internal research.
- To comply with rules that apply to us about keeping records, particularly financial records for HMRC that must be retained for 7 years.
- Our legitimate interests.
- If you have made a request to have your information corrected if it's inaccurate or incomplete.
- We may also keep your data for longer if we cannot delete it for legal or regulatory reasons, such as retaining the information for tax and accounting.

- After this time, we will either securely erase or anonymise your information where we no longer have a legitimate reason for keeping If this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.
- Your personal information is important to us, and we will make sure your privacy is.
- Our Gift Cards have no expiry date; after 3 years we will remove the personal
  information that identifies the gift card recipient; however, the barcode / card
  number will still retain the relevant amount of credit, and this can still be redeemed
  by the recipient.

## Who do we share your personal information with?

We will not sell, distribute, or lease your personal information to third parties. Any personal information we request from you will be safeguarded under current legislation. We will only share your information with companies if necessary to deliver services on our behalf, such as reservation booking platform, OpenTable, gift voucher solutions providers, EPOS software providers and IT consultants. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality and your information may be shared with third parties on an anonymised basis.

Third parties (including OpenTable) whose content appears on our site may use third-party Cookies, as detailed below. Please refer to 'Use of Cookies' for more information on controlling Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies, organisations and law enforcement agencies for the purposes of fraud protection, prevention or detection and credit risk reduction.

### Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing -** You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you wish to make a request, please contact us at enquiries@theoldpostofficehaworth.co.uk, or by writing to us at:

The Old P.O. (Haworth) Ltd. Haworth Old Post Office 121 Main Street Haworth West Yorkshire BD22 8DP

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the address above, or by emailing enquiries@theoldpostofficehaworth.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk