

## How Punch uses your information

### 1 **Who we are**

We are Punch Taverns Ltd a company incorporated in England and Wales with registered number 03752645 with registered office at Jubilee House, Second Avenue, Burton on Trent, Staffs, DE14 2WF

We are also registered with the Information Commissioner's Officer with registration number Z1301910. This registration covers the uses of personal information set out below.

### 2 **How we collect your personal information and why**

Punch Taverns Ltd (**we, us, our**) may need to collect personal information about you, and there are different ways that we might do so; this privacy notice tells you what to expect when we collect personal information on:

- 2.1 visitors to our website,
- 2.2 anyone who interacts with us or contacts us through social media
- 2.3 anyone who contacts us;
- 2.4 anyone who subscribes to receive updates;
- 2.5 anyone who books a room;
- 2.6 anyone who makes a payment for a booking.

#### 2.1 **Visitors to our websites**

Our website is managed by Guestline Limited (**Guestline**). As part of the service provided by Propeller, they will help to maintain the security and the performance of our website by (i) protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors and (iv) providing secure hosting services through Azure Cloud Services located in Netherlands and Ireland. Guestline's legal notice can be found at <https://www.guestline.com/contact/legal.html>

##### 2.1.1 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our website for our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our website, which allows us to provide you a better experience and also allows us to improve our website.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies as described below. However, if you do block cookies there may be parts of our website that you will be unable to access or that will not function properly.

- (a) Our cookies help to:
  - (i) make this website work as you would expect;
  - (ii) remember your settings during and between visits;
  - (iii) improve your and other users' experiences of the website;
  - (iv) allowing you to sign up to marketing and updates if you have requested to do so;
  - (v) remembering if we have already asked you certain questions;
  - (vi) improve the speed/security of this website.

- (b) We do not use cookies to pass personal data to third parties (except as set out in the Privacy Policy).
- (c) We use analytical/performance cookies.

They allow us to compile visitor statistics recognise and count the number of visitors and to see how visitors move around our website when they are using it. It also compiles data on what technology you are using (eg. Mac or Windows), which helps to identify when websites are not working as they should be for particular policies. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Analytical/performance cookies			
Functional cookie	JSESSIONID	Session cookie (lasts for the duration of your website visit) when booking a room	Session ID reference, used when a room is being booked

#### 2.1.2 Third party services

- (a) Whenever you visit our website, [www.theploughellington.co.uk](http://www.theploughellington.co.uk), we will use a third party service, Google Analytics, for our legitimate interests, to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is so that we can find out how many people visit the website and the various parts of the website. This information helps us to find out how our website is working and how to improve it. We do not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our website. You can opt-out of being tracked by Google Analytics by visiting <http://tools.google.com/dlpage/gaoptout>. We'd prefer you didn't opt out, as this data is helpful to us in improving this Website.

Google analytics cookies		
Cookie Name	Expiry	Description
__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	10 minutes	Used to throttle request rate.
__utmb	30 minutes from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmc	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	6 month from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library

		executes and is updated every time data is sent to Google Analytics.
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### 2.1.3 Turning cookies off

- (a) You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. The "Help" function within your browser should tell you how. Alternatively you can visit <http://www.attacat.co.uk/resources/cookies/how-to-ban> or [www.allaboutcookies.org](http://www.allaboutcookies.org), which provide general information about cookies and how you can manage cookies on your computer.
- (b) Please be aware that switching off cookies is likely to limit the functionality of our website.
- (c) It may be that if you have concerns around cookies they in fact relate to so called "spyware". Rather than switching off cookies in your browser you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive.

## 2.2 Social media

Our website contains links to our social media pages. Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the social media network. We currently use:

- (a) Twitter, which has its own privacy notice that can be located at <https://twitter.com/privacy>; and
- (b) Facebook, which has its own privacy notice that can be located <https://www.facebook.com/privacy/explanation>; and
- (c) Instagram; which has its own privacy notice that can be located at <https://help.instagram.com/155833707900388>

We recommend that you read their privacy notices and contact them directly if you have any concerns regarding their use of your personal information.

## 2.3 Contacting us

### 2.3.1 Website contact

When you contact us through our website, we will receive any personal information you have submitted in the contact us as a message in [Reslinks](#). We will direct these details to employee that we believe is best placed to respond to you communication. The personal information you have provided will be used by us in our legitimate interests for the sole purpose of dealing with and responding to your communication. Our website provides you with different ways to contact us. All communications are handled, reviewed and responded to internally by us.

### 2.3.2 Telephone contact

When we speak to you over the phone, the personal information we collect will depend on the nature of your enquiry. We will collect your name, address, email address and telephone number for our legitimate purposes of maintaining communications with you to deal with your enquiry. This personal information will be recorded on [Reslinks](#).

Any personal information we collect from you will be stored in **Reslinks**, a database hosted and looked after for us by Guestline in Netherlands and Ireland.

### 2.3.3 All contact

email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law;

Please note that we may need to contact you through any of post, email or telephone. Please can you make sure that you keep us updated of any changes to your contact details.

#### 2.4 **Subscribing to our updates**

We will provide you with the opportunity to receive updates about us, including promotions and reminders relating to your booking. Where you chose to receive updates we will collect your contact details (name and email address) in order to provide marketing updates. We are relying on your express consent to choose to receive these updates in order to use your personal information for this purpose.

We use Punch Taverns Limited to manage our subscriptions to updates. If you ever decide you no longer wish to receive our updates you can opt out at any time by unsubscribing from the mailing list using the link provided in the email update, or by using the contact details below. If you do unsubscribe, please note that Punch will still keep your email in a separate list on our behalf so that we can make sure we do not send you updates in the future.

We will also keep a record of the date, time and manner in which you opted into receiving marketing updates. This is also in our legitimate interests of demonstrating accountability of our data protection obligations.

#### 2.5 **Booking a room**

We will collect your name, address, email address, telephone number and details of a booking when you book a stay through our website. [You may provide us with other information related to your booking such as special requests or accessibility requirements.] We will also ask for the name of any guest who will be staying with you or who you have made the booking on behalf of. We require this information in our legitimate interests to make and manage your booking and to contact you if there are any changes to or issues with your booking. All personal information that we collect about you in relation to your booking whether collected online through our website, over the phone or in person, will be stored on [Reslinks](#). We will give you the option to save your details on our website so you can retrieve them in order to make future bookings.

#### 2.6 **Payments for bookings online**

If you make a booking through our website, we will ask you to pay the booking fee at the time of confirmation. We will collect this personal information as a contractual necessity in order to complete the transaction and without which we cannot guarantee to reserve your booking. The personal information includes cardholder name, payment card details and number. We use Guestline's secure payment gateway via Secure Trading to process payments which means that we will never see these payment details once you submit your confirmation.

Guestline has level 1 compliance, being the highest standard for compliance, for hosting and payment processing standards. It is also a VISA approved merchant, so you can be reassured, your personal information will be safe with Guestline.

### **3 Disclosure of personal information**

We do not transfer your personal information outside of the EEA.

We will not usually disclose your personal information other than as already explained in [Section 2](#) above. However, there may be circumstances where we need to share personal information other than as anticipated in [Section 2](#) above. These include:

- (a) where we are legally required to disclose the information. This includes sharing the personal information with tax authorities and law enforcement agencies in their legitimate interests, for the purposes of the prevention and detection of crime;
- (b) where we need to disclose the personal information for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights, where this is in our or a third party's legitimate interests;
- (c) disclosure is required to protect the our interests, or someone else's interests (for example, to prevent fraud);

- (d) disclosure is necessary to protect your vital interests (for example if you are unwell at one of our premises, we may need to seek medical assistance);
- (e) it is to a third party for the purposes of providing administrative or processing services on our behalf. If such disclosure is required we will take steps to ensure that the third party protects the personal information in the same way that we do and notify you of any changes to this privacy notice; and
- (f) to any prospective purchaser of our business assets or organisation.

#### **4 Keeping personal information secure**

We know that you provide your personal information in good faith and expect it to be look after. This is why we take the security of your personal information seriously. This means that we have taken steps internally in order to ensure that our systems adequately protect your personal information. This includes:

- (a) ensuring strict access controls on a need to know basis; and
- (b) operating onsite security measures.

#### **5 Your rights**

You have rights in respect of your personal information and this Section explains a bit more about those rights that are applicable to what we do with your personal information and when you can exercise them. If you would like more information about any of your rights, please contact us on the details set out [below](#). Please allow us up to 7 calendar days to process your request and remove you from our mailing list.

##### **5.1 Opting out from receiving marketing**

Where you have chosen to receive marketing you can opt out. If you wish to opt-out, please do so by sending your request in writing to the Data Controller at [data.protection@punchtaverns.com](mailto:data.protection@punchtaverns.com) or our address as set out below

Please allow us up to 7 calendar days to process your request and remove you from our mailing list.

##### **5.2 Accessing your personal information**

We want you to fully understand and be comfortable with how we use your personal information. You can contact us at any time to ask whether we process any personal information about you. If we do hold or use your personal information in any way, you have the right to access that personal information. All we ask is that:

- (a) you make your request to access in writing to the contact details below;
- (b) you verify your identity; and
- (c) you are fair and reasonable with how often you make this kind of request.

Please allow us up to one month from receipt of your request in order to provide a response.

##### **5.3 Requesting more information**

We hope that you can understand that it is very difficult to cover all the possible ways in which we collect and use personal information. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal information develops. However, if you have any questions regarding our use of your personal information, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any specific questions, or need anything explaining, please get in touch on the contact details [below](#).

##### **5.4 Additional rights**

You also have some additional rights that you may exercise as set out here. We may publish a policy, from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will

provide a link to it here. In each instance we may ask you to make your request in writing to the contact addresses [below](#) and provide verification of your identity.

- 5.4.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address).
- 5.4.2 You have the right to request that we erase your personal information. Please be aware that we can only comply with such a request if:
  - (a) your personal information is no longer required for the purposes it was collected for (for example, we need your personal information to respond to a communication);
  - (b) the collection, storage or use of the personal information by us is prevented by law;
  - (c) your personal information is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings.
- 5.4.3 You have the right to request that we restrict or refrain from processing your personal information:
  - (a) for the time it takes us to verify the accuracy of your personal information where you have disputed its accuracy;
  - (b) where the collection, storage or use of the personal information by us is unlawful but you decide not to ask for erasure;
  - (c) where, we no longer need your personal information but you need them for the purposes of establishing, exercising or defending a legal claim;
  - (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal information, where you have exercised your right to object to processing.
- 5.4.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.
- 5.4.5 You have the right to object to our use of your personal information:
  - (a) where we are using that information based on our legitimate interests, and where we do not have compelling overriding grounds to continue to use your personal information; or
  - (b) at any time, where we use your personal information to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

## **6 Complaints**

You are important to us, and so is protecting your personal information. We have high standards when it comes to collecting and using personal information. For this reason, we take any complaints we receive from you about our use of your personal information very seriously and request that you bring any issues to our attention.

Where you are communicating with us for the purpose of making a complaint, we will only use your personal information to handle, investigate and respond to the complaint and to check on the level of service we provide. Where the complaint is about a member of our team, we may have to disclose your identity to whoever the complaint is about. You may let us know that you don't want information that identifies you to be disclosed and we will try to respect your request; however, it may not be always possible to handle a complaint on an anonymous basis.

If you are unhappy, you can also contact the Information Commissioner's office to make a complaint directly.

## **7 Updating this privacy notice**

We keep our privacy notice under regular review in order to ensure that it properly reflects our use of personal information. This privacy notice was last updated on 28 March 2018.

**8 How to contact us**

You can contact us by:

- (a) **Post:** Punch Taverns Ltd, Jubilee House, Second Avenue, Burton on Trent, Staffs, DE14 2WF
- (b) **Email:** [data.protection@punchtaverns.com](mailto:data.protection@punchtaverns.com)

**Telephone:** 01283 501600