# **Blacklock**

This is the main privacy policy for Blacklock, and describes how we collect personal data from you and use cookies. We are the data controller in respect of the data we collect from you and about you.

# FIRST AND FOREMOST, WE ARE COMMITTED TO PROTECTING YOUR PERSONAL DATA AND KEEPING IT SAFE AND CONFIDENTIAL.

We agree to do our very best to protect your privacy by making sure we have appropriate security measures in place to protect that information and to comply by all UK Data Protection legislation in relation to your personal data. Access to your personal data will be limited to our employees and certain third parties who process it on our behalf, we will never sell your personal data or pass it on to a third party for use by them.

#### HOW WE USE AND PROTECT YOUR PERSONAL INFORMATION:

We may collect different types of information about you during the course of our business – with the primary objective of welcoming you to one of our Blacklock restaurants.

# We may also use your personal data for any or all of the following purposes:

- To provide you with a high level of customer service (including helping you with enquiries and bookings) and personalise the service you receive from us.
- To communicate with you about our offers, promotions, news, upcoming events, new openings or any other updates, with your consent.
- To meet our legal obligations and for establishing or defending our legal rights.
- To compile reports and help us understand and improve our digital applications or marketing activity. We compile reports on our marketing activity such as open rate and click rate on emails. We also use number of people served each day to compile reports on how our restaurants are doing.

Information you give us: could include name, email address (personal and/or work), telephone number(s), and if provided, postal address and date of birth given to us when you make a booking directly at one of our restaurants, or if you sign up online to receive our newsletter. We may also have information regarding your visits to our restaurants including date and time of bookings, number of guests, and any special requests made when booking or during the course of your visit.

**Information recorded when you visit our websites:** we may also obtain information about you when you visit <a href="www.theblacklock.com">www.theblacklock.com</a> to read or download information (such as your IP address which is automatically

recognised by the web server) or if you comment or send a message to us through one of our social media presences.

In common with many websites, we use "cookies" to help us gather and store information about visitors to our websites. A cookie is a small data file that our server sends to your browser when you visit the site. The use of cookies helps us to assist your use of certain aspects of the site. You can delete cookies at any time or you can set your browser to reject or disable cookies.

We primarily use information from cookies for the following purposes:

- Traffic monitoring, e.g., the IP address from which you access the site, the type of browser and operating system used to access the site, the date and time of your access to the site, the pages you visit, and the Internet address of the website from which you accessed the site.
- To register you in programs and to recognize your website preferences.
- To recognize repeat visitors for statistical / analytical purposes.
- Anonymous tracking of interaction with online advertising, e.g., to monitor the number of times that a banner ad is displayed and the number of times it is clicked.
- To compile and report to third parties (such as advertisers) aggregate statistics about our users in terms of numbers, traffic patterns and related site information.
- We may also use clear gifs (also known as web bugs or web beacons), which are tiny graphics embedded in web pages and email messages that we use, in connection with cookies, to collect non-personal information from users to analyse site usage, manage content on the site, track visits to other related sites, and track the performance of online advertising.
- We may also connect the information that we collect through cookies and clear gifs with other personal information that you provide to us in order to:
  - monitor your use of our website(s) in order to make our communications to you as relevant as possible and for other marketing and advertising research purposes.

We also use Google Analytics on our site to monitor site usage, such as how long you spend on our website and which pages you visit, if you used a search engine to find us. This information is used to help us understand how our customers are using our website.

Information collected from third parties: we may have received your information (name, email address, phone number, date and time of booking) through a third party booking site, such as Open Table. Their individual privacy policies, including how they process your data, are available on their websites and you will always be asked when you book through them about passing your information on to us, and if you want to be added to our mailing list.

**Linked sites:** We may have links to other websites that are not managed by ourselves. We do not take responsibility for any information you share with these linked sites.

#### SHARING OF YOUR PERSONAL DATA:

We sometimes need to share the information we process with other organisations and where necessary, or required we may share your personal data with the following categories of third parties:

- Service providers assisting with our business activities (for example the companies that send our marketing emails on our behalf), payment service providers, providers of booking systems, hosting providers, providers of IT support,
- Ombudsman, regulators, public authorities and security organisations such as the police, HM Revenue and Customers and the Information Commissioner's Office to the extent required by law, regulation or to exercise or defend our legal rights, including if we suspect fraud or attempted fraud.
- Staff of Blacklock Restaurants

## TRANSFER OF YOUR DATA OUTSIDE OF THE UK OR EEA

We do not transfer any of your personal data outside of the EEA. At the time of this privacy policy third parties with whom we share your data, for purposes of emailing our newsletters for instance, do not transfer or store any data outside of the EEA. In the event that a third party processor, engaged by us would transfer data outside of the EEA we will ensure that appropriate safeguards to protect your data are in place and would update this Privacy Policy to reflect those changes. If your data has come to us through a third party booking site, please refer to their individual Privacy Policy, available on their websites for detail about how they may process and transfer your data.

### PROCESSING YOUR PERSONAL DATA

In particular, we use your information:

- Where we have obtained your consent (and before any withdrawal of your consent – see below). Including to:
  - contact you via email from time to time with information we think may be of interest about our restaurants and services.

You may withdraw your consent at any time by contacting us using the details set out at the end of this Privacy Policy **AND/OR** by using the unsubscribe button in any of the emails we send to you. For more information on your rights, please refer to the section "Your rights"

- Where it is necessary for the performance of a contract with you.
  Including to:
  - o provide you with our offering; and
  - o Process your payment.
- In line with our legitimate business interests to:
  - to respond to enquiries and bookings made by you at one of our restaurants;
  - prevent fraud;

- In compliance with our legal obligations. Including:
  - o To adhere to all relevant UK regulations and laws

We will not use your information for any other purposes unless we are required to do so by law, in connection with any legal proceedings, or in order to establish, exercise or defend our legal rights.

Where we have relied on our legitimate interests to process your personal data, you may contact us to obtain more information, including in relation to our assessment of the impact on you.

#### **OUR MAILING LIST**

If you are on our mailing list we will periodically (usually monthly) send you emails about our restaurants, new openings, special offers and news updates from Blacklock. If you want to unsubscribe from these you can do so at any time, just hit unsubscribe at the end of the email you have received from us or use the contact details below.

### YOUR RIGHTS IN RELATION TO YOUR DATA

You have the following rights regarding your information:

Rights	What does this mean?
Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Policy.
2. Right of access	You have the right to obtain access to your information (if we are processing it), and other certain other information (similar to that provided in this Privacy Policy).
<ol><li>Right to rectification</li></ol>	You are entitled to have your information corrected if it is inaccurate or incomplete.
4. Right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
<ol><li>Right to restrict processing</li></ol>	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
<ol><li>Right to data portability</li></ol>	You have the right to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances. In addition, where certain conditions apply, you

7. Right to withdraw consent

have the right to have such information transferred directly to a third party.

If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).

Right to object to processing

In addition to the above rights, you also have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests grounds (including processing for direct marketing).

To exercise any of these rights at, any time, you can contact us using the details set out at the end of this privacy policy.

### How long we keep your information

We only keep your information for as long as is reasonably necessary for the purposes set out in this Privacy Policy and to fulfil our legal obligations. We will securely erase your information if we decide that we no longer need it or if you contact us to request your data is deleted.

# Contacting us and making a complaint

Please do contact us if you have any questions or complaints about this privacy policy or about how we handle your information.

This privacy statement covers Blacklock restaurants website at the following address: www.theblacklock.com

Understudy Limited t/a Blacklock is registered in England Reg No 08641225 24 Great Windmill Street, London, W1D 7LG

If you have any comments or questions, please contact us at the address above or via email to <a href="mailto:hello@theblacklock.com">hello@theblacklock.com</a>.

If you are not satisfied with our response to any query or request or you believe our use of your information does not comply with data protection law, you can make a complaint to the UK regulator in relation to data privacy, being the Information Commissioner. See www.ico.org.uk for more information.

### Changes to our privacy policy

Should we elect to change our privacy policy, we will post the changes here and if appropriate contact you to inform you of any changes.

#### **DISCLAIMER**

Understudy Limited t/a Blacklock is registered in England Reg No 08641225

#### 24 Great Windmill Street, London, W1D 7LG

The Blacklock website, Understudy Ltd and material relating to information, products and services (or to third party information, products and services), is provided 'as is' without any representation or endorsement made and without warranty of any kind whether express or implied, including but not limited to the implied warranties of satisfactory quality, fitness for a particular purpose, non-infringement, compatibility, security and accuracy.

We do not warrant that the functions contained in the material contained in this site will be uninterrupted or error free, that defects will be corrected, or that this site or the server that make it available are free of viruses or represent the full functionality, accuracy, reliability of the materials.

In no event will we be liable for any loss or damage including, without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from use or loss of use of, data, or profits, arising out of or in connection with the use of the Understudy Ltd t/a Blacklock website.

These Terms and Conditions shall be governed by and construed in accordance with the laws of England and Wales. Any dispute arising under these Terms and Conditions shall be subject to the exclusive jurisdiction of the courts of England and Wales.