PRIVACY POLICY

1. Introduction

Hanson Catering Ltd trading as the Ragged Cot is committed to protecting the privacy of all customers irrespective of the relationship that you have with us. This Privacy Policy applies to the personal data that we collect and use for our customers within the pub, restaurant & hotel. By providing your personal data to us, you acknowledge that it will be processed in accordance with this policy.

2. Who is responsible for your data

To facilitate the delivery of our products and services, Hanson Catering Ltd trading as The Ragged Cot is responsible for customer data.

3. Personal data we collect about you

We collect personal data for a variety of purposes as outlined in this section. You will provide much of this data to us directly by completing online forms or by communicating with our employees, but we also gather some data via the digital interactions that you have with us.

Name and contact details (email address, telephone number and postal address)	 When you book a table/function/hotel room/Gift Voucher. When you choose to receive marketing communication. When you provide us with feedback or submit an enquiry. When you use WiFi.
Nationality / Passport Number	When you are an overseas visitor and book a hotel room.
Date of Birth	 To confirm that you are over 18, in order to receive licensed goods and services. When you choose to provide it for marketing personalisation.
Interests	When you choose to provide it for marketing personalisation.
Dietary and special needs requirements	When you choose to provide it when booking a table / function / hotel room.
Information about other guests on your booking including details of any children	When you provide them on behalf of others as part of making a table / function / hotel booking
The correspondence that you have with us (eg emails, letters, calls)	When you contact us or we contact you. This may include telephone call recording.

Your location / visit information	When you use WiFi.When you make a booking.When you stay at The Ragged Cot
Your food / drink transaction details	When you book a table / hotel room.
CCTV Recording	When you visit The Ragged Cot
Information about how you use our websites including IP address and Google Analytics.	When you browse our websites.
Device Information	When you use our WiFi or leave us feedback.

Special Category Personal Data

The GDPR definition of Sensitive Personal Data includes data relating to health and religious beliefs. As a result of you telling us that you have an allergy or a specific dietary requirement you may reveal medical conditions or religious beliefs. Sensitive Data will only be processed in order to deliver the products / services that you purchase from us.

4. How and why we use your personal data

We use your personal data to provide the following services

- To deliver your bookings. When you book with us we will use your information to confirm your booking and any payments you have made and to send any follow up emails, written correspondence or telephone conservations.
- To keep you informed of our products, services, offers and promotions. We may send you marketing communications about our food, drink, hotel rooms, and events if you have indicated that you are happy to receive these (e.g. when you opt in to marketing when you book from us).
- To personalise and improve your customer experience. We may use your personal data in order to tailor our services to your needs and preferences and to provide you with a personalised customer experience.
- To optimise the performance of our websites. We may also collect information on how you use our websites including the pages that you visit and the search criteria that you perform in order to optimise the performance of the website and personalise content that you see.
- To meet our legal obligations. We are required to keep certain records for legal reasons for example invoices that we issue. We will keep and use this data in line with our legal requirements.
- We use CCTV to deter and detect crime and civil offences, to support court action and comply with our legal licensing requirements. We also use CCTV to provide a safe environment for our staff and customers.
- For market research and to deliver business insight to help us ensure that our products and services remain relevant.

5. Sharing your personal data.

• We are reliant on a number of 3rd party providers in order to provide our products and services. Where this is the case we will remain in control of the data and we will ensure

that the 3rd parties comply with high security standards for the protection of your personal data and the data will only be used for The Ragged Cot purposes.

- Our 3rd party providers include:
 - o Website hosting company: www.toolkitwebsites.co.uk
 - o WiFi providers. BT Business
 - o Card payments: Elavon.
 - O Hotel Booking Platform Provider. www.eviivo.com. This platform hosts other booking agents, such as Booking.com / Expedia/ Late Rooms and other reservation services in order to take hotel bookings on our behalf. Customers that choose to use these sites will be doing so under the terms and conditions and privacy policy of these sites. In order to deliver the booking, the 3rd party will share your data with us and once they have done so, we will use the data in accordance with this Privacy Policy.
- Legal authorities and legal advisors.

6. Transfer of Data outside the EU

Most of the Ragged Cot's operations covered by this policy are based in the EU. However, the technical infrastructure of some of our providers is located in data centres outside the EU. The data will be transferred outside the EU in line with their privacy policies.

We are currently auditing all of our suppliers and this policy will be updated if new information comes to light.

7. The legal basis for processing your Data

We rely on the following reasons for using your data.

- Compliance with a legal obligation / regulatory authority.
- Performance of a Contract. In order to deliver the service that we have agreed to provide you with (such as a hotel or table booking).
- Legitimate Interest. In order to improve customer experience and develop our products & services.
- Consent where you have specifically consented to us using the data.

8. Retention and Security of your Data

We will only retain your personal data for as long as is necessary. This duration will depend on the type of data and the reason for processing it. For example:

- We will view consent to receive marketing communication as revoked if the marketing communication hasn't been engaged with (opened or clicked) within 13 months.
- We are required to keep invoices if you stay in our hotels for 6 years.
- We will ensure that we use appropriate technical and organisational security measures in order to ensure that your data remains secure. These measures include internal policies and staff training, appropriate contracts with 3rd party suppliers and role-based access control.

9. Your Rights

You have certain rights in relation to the personal information we hold about you. Some of these rights only apply in certain circumstances. In order to exercise these rights please contact us using the contact details below. Please note that we will require proof of identity as part of this request and most rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

- Right of Access. You have the right at any time to ask us for a copy of the data that we hold about you and how it is used.
- Right of Correction or Completion. If the data that we have collected is inaccurate you have the right to update it.
- Right of Erasure. In certain circumstances, you have the right to request that Information we hold about you is erased. This usually applies if the data is no longer necessary for the purpose that it was collected for, or you withdraw your consent for its processing and request its erasure.
- Right to Object to or Restrict Processing. If you wish to challenge our need to process your data on legitimate interest grounds or if you wish to withdraw your consent.
- Right of Data Portability. You have a right to request that we transfer your data to another data processor.

10. Cookie Policy

In conjunction with Toolkit.co.uk

When you visit our websites, we use cookies. Cookies allow us to identify the computer or device you're using to access our websites - but we can't identify you personally. You can set up your web browser to refuse cookies, but this website will then fail to operate correctly.

The Ragged Cot website only creates two Cookies and these cookies are 'Absolutely Necessary' for the functioning of your website. These cookies are 'ASP.NET_SessionId' & "JSESSIONID". 'ASP.NET_SessionId' stores a 'Session ID' which is used by Microsoft .NET Framework to deliver the web pages to the visitor.

The New Relic JSESSIONID cookie is used to store a session identifier so that New Relic can monitor session counts for our applications. The cookie value is generated by Jetty.

We use <u>New Relic</u> to help us track any potential server errors and review the performance of our hosting platforms.

These cookies expire at the end of sessions which is when a visitor goes to another website or closes their browser window.

Because they do not remain on your computer it has no way of tracking your website usage or retaining any of your data post expiry. This means consent is not required.

Cookie Names: ASP.NET_SessionId, JSESSIONID

Google Analytics

Google Analytics is used to track visitors and measure traffic to our website. We understand that the ICO do not view Google Analytics cookies as intrusive and they do not require 'explicit consent' from websites who use these cookies.

Non-essential

These cookies collect analytical data about how visitors use our site - so that we can improve and personalise the website experience. No personal data is used or stored in these cookies.

Cookie Names: _utma / _utmb / _utmc / _utmz

11. Updates to our Privacy Policy

We may make changes to this Privacy Policy from time to time, when we do we will publish the updated version on our website.

12. Contact Information

If you have any questions about this policy or how your data is processed, please contact us at

The Ragged Cot, Cirencester Road, Minchinhampton, Stroud, GL6 8PE Telephone 01453 884643 info @theraggedcot.co.uk

Should you have any concerns about this policy or the way that we are processing data you have the Right to Lodge a Complaint with the Information Commissioner's Office. Please look at www.ico.org.uk for more detail.

GDPR Version 1.0. This policy was last updated on 20th May 2018