

# Privacy Notice

## 1 Who we are

This privacy policy drawn up on behalf of Kanto Stranmillis Limited describes how we use your personal information whilst at the same time respecting your privacy.

Kanto Stranmillis Limited, company number NI663625 has its registered offices at 2 Hanover Grove, Bangor, BT19 7ZT (hereafter referred to as "**we**").

We respect your privacy and value the trust you place in us when you share your personal information with us. This policy sets out how we, as data controller, collect and use your personal information, why we use it, with whom we share it, the rights to which you may be entitled and your choices about our use of your personal information.

This policy covers our use of your personal information arising from use of this website as well as using any of our services.

If you have any questions or need any further clarity, please get in touch. Contact details are set out below.

## 2 Your information

### **Data Collection and Usage**

We will collect and use your personal information to allow you to access to this website and use our products and services.

Your information may be shared with some third parties.

	<b>What we collect</b>	<b>How we use it</b>
<b>1</b>	<p>Information that you give us to <b>when completing a purchase in one of our restaurants</b>;</p> <ul style="list-style-type: none"> <li>Your contact details including: your name, address, email address;</li> <li>Your bank account details;</li> <li>The details you provide to make a reservation or booking;</li> <li>The food you purchased</li> </ul>	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>Provide our products and services;</li> <li>Manage and administer our services;</li> <li>Process your order;</li> <li>Take payment from or give you a refund;</li> <li>Help us ensure that our customers are genuine and to prevent fraud;</li> <li>Provide a reservation or booking service;</li> </ul>
<b>2</b>	<p>Information about the way <b>you use our services</b> including:</p> <ul style="list-style-type: none"> <li>The things that we've provided, or you've purchased;</li> <li>When and where you've made the purchases;</li> <li>What you paid and how;</li> <li>Whether you've opened electronic communications from us;</li> </ul>	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>Develop new services;</li> <li>Improve our services;</li> <li>Identify products and marketing that may be of interest to you;</li> <li>Personalise our service of things you're interested in and how you use our services;</li> <li>Statistical analysis and research.</li> </ul>
<b>3</b>	<p>Information when <b>you communicate with us</b> whether in person, through our website or via email, over the phone, through social media or via any other medium, including:</p> <ul style="list-style-type: none"> <li>Your contact details (this may include your social media account if that's the way you communicate with us);</li> <li>The details of your communications with us;</li> <li>The details you provide to us when you complete a survey;</li> <li>The details of our messages to you.</li> </ul>	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>Answer any issues or concerns;</li> <li>Monitor customer communications for quality and training purposes.</li> <li>Develop new services;</li> <li>Improve our services;</li> <li>Personalise our service.</li> </ul>
<b>5</b>	<p>Information that we collect through <b>your use of our website</b> including:</p> <ul style="list-style-type: none"> <li>Device information such as operating system, unique device identifiers, the mobile network system;</li> </ul>	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>Provide our services;</li> <li>Develop new services;</li> <li>Improve our services;</li> <li>Identify issues with the website and user's experience of it;</li> </ul>

	What we collect	How we use it
	<ul style="list-style-type: none"> <li>• Hardware and browser settings;</li> <li>• Date and time of requests;</li> <li>• The requests you make;</li> <li>• The pages you visit and search engine terms you use;</li> <li>• IP address.</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor the way our website is used.</li> </ul>
<b>7</b>	<p>Information that we collect incidentally from <b>other sources or public sources</b>, including:</p> <ul style="list-style-type: none"> <li>• Information available in the media;</li> <li>• Information presented on our social media timelines;</li> <li>• Information collected by security systems.</li> </ul>	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>• Maintain market awareness;</li> <li>• Build and maintain social media branding;</li> <li>• Provide security to our sites.</li> </ul>
<b>8</b>	<p>Information that we collect from <b>individuals representing organisations</b>, including:</p> <ul style="list-style-type: none"> <li>• Contact details of individuals working for organisations;</li> <li>• Other personal information regarding such individuals.</li> </ul>	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>• Build relationships with other organisations.</li> </ul>

### Why we collect and how long we keep your information

We collect and use your information for a variety of reasons. We need some information to enter into and perform our contract – for example your contact and payment details.

Some information processing is required by law due to our anti-fraud screening obligations or in the public interest such as making sure we verify our customers' identities.

Some information is processed because you've given your consent to that, which can be withdrawn by notifying us at [Janine.mark@adad.co.uk](mailto:Janine.mark@adad.co.uk).

Other information we collect because we have legitimate business interests, for example, in:

- Understanding how our customers use our products, services and websites;
- Understanding and responding to customer feedback;
- Researching and analysing the services our customers want;
- Improving our services;
- Receiving information from other entities in our group/other members of our loyalty scheme about shared customers;
- Understanding the type of products and services our customers buy and how they use them;
- Personalise our offers so we're better able to provide offers and ideas that are relevant to you;
- Maintaining a public profile on both traditional and social media;
- Providing security over our business and who we trade with; or
- Developing and maintaining relationships with vendors, partners and other companies and dealing with individuals who work for them in our sector.

We will keep your information for as long as it is reasonably necessary. It will depend on factors such as whether you have any outstanding purchases or an account with us or have interacted with recent offers. We will also routinely refresh our information to ensure we keep it up-to-date.

### **Other uses**

#### **Automated decision making**

We do not undertake any automated decision making.

#### **Legal requirements**

Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims. We will not delete personal information if it is relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

#### **Special information we collect**

Certain types of personal information are more sensitive than others. This "special information" about you includes information about health, disability, race, ethnicity, criminal offences (or alleged offences), political opinions, biometrics or religion.

We may collect and receive special information about you. We have identified below the types of special information we may collect or receive, how we will use it and why we will use it.

	<b>What we collect</b>	<b>How we use it</b>
<b>1</b>	Information that you give us or that we receive when using our services: <ul style="list-style-type: none"><li>If you book for a function and there are people in your party who have special dietary requirements you will provide us with details of those</li></ul>	We use this information to: <ul style="list-style-type: none"><li>Provide our services</li></ul>

#### **Why we collect and how long we keep your information**

This information may be collected and used when it has been made publicly available.

When you provide us with this information you are consenting that we may collect and use it in the way we've set out.

We will keep your information for as long as it is reasonably necessary. It will depend on factors such as whether you've any outstanding purchases or an account with us or have interacted with recent offers. We will also routinely refresh our information to ensure we keep it up-to-date

## Information we share

There are certain circumstances where we may transfer your personal data to employees, contractors and to other parties.

- We may share information about you with other members of our group of companies, so we can provide the best service across our group.
- We may also share your information with certain contractors or service providers. They may process your personal data for us, for example, if we use a marketing agency.

Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function.

- We may also share your information with certain third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

Your personal information may be transferred to other third-party organisations in certain scenarios:

- If we're discussing selling or transferring all or part of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you;
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

### **3 Your rights**

You may have certain rights in relation to your information including a right to access or to correct the information we hold on you.

#### ***Data Subject Rights***

We've listed the rights you have over your information and how you can use them below.

These rights will only apply in certain circumstances. They will generally not be available if there are outstanding contracts between us, if we are required by law to keep the information or if the information is relevant to a legal dispute.

- You can remove consent, where you have provided it, at any time.
- You can ask us to confirm if we are processing your information.
- You can ask for access to your information.
- You can ask to correct your information if it's wrong.
- You can ask us to delete your information  
You have a right to be forgotten and you can ask that our systems stop using your information.
- You can ask us to restrict how we use your information.
- You can ask us to help you move your information to other companies.  
To help with that, you have a right to ask that we provide your information in an easily readable format to another company.
- You can ask us to stop using your personal information, but only in certain cases.
- You have the right to complain to the relevant supervisory authority.

#### ***Use by Children***

We do not intend for our websites or online services to be used by anyone under the age of 18. If you are a parent or guardian and believe we may have collected information about your child, please contact us as described in the 'Contact Us' section of this policy.

### **How to contact us**

If you have any questions about this policy please contact our Data Protection Officer: [Janine.mark@adad.co.uk](mailto:Janine.mark@adad.co.uk) or 028 9070 7616, or 18 Orby Link, Belfast BT5 5HW.

### **Changes to the policy**

This policy will be changed from time to time.

If we change anything important about this policy (the information we collect, how we use it or why) we will highlight those changes at the top of the policy and provide a prominent link to it for a reasonable length of time following the change.

### **Other policies**

#### **Cookies**

We use cookies that identify your browser or device. They collect and store information when you visit our website [or app] about how you use it.

#### **Security**

We are committed to keeping your personal information safe. We have physical, technical and administrative measures in place to prevent unauthorised access or use of your information.