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## VIVAT BACCHUS LTD PRIVACY POLICY

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Vivat Bacchus Ltd is committed to protecting your privacy and takes its responsibilities regarding the security of customer information very seriously. This Privacy Policy applies to the personal data that Vivat Bacchus Ltd collects and uses, and explains what personal data we collect about you, how and why we use it, how you can control your data, who we disclose it to and how we protect your privacy.

### Topics

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### 1. Who is responsible for your data?

References in this privacy policy to “Vivat Bacchus”, “Vivat Bacchus Ltd”, “we”, “us” or “our” mean Vivat Bacchus Ltd, a company registered in England and Wales:  
Company address: Bank House, 81 St Judes Road, Englefield Green, Surrey, TW20 0DF  
Company registration no: 04100704

Vivat Bacchus Ltd is registered with the Information Commissioner’s Office (ICO).

We control the ways your personal data are collected and the purposes for which your data are used by Vivat Bacchus Ltd and are the “data controller” for the purposes of the UK Data Protection Act 1998, EU General Data Protection Regulation (GDPR), PCI-DSS and European Data Protection legislation.

### 2. Your rights

You have the following rights under the GDPR, which this policy and our use of personal data have been designed to uphold:

- a) The right to be informed about our collection and use of personal data;
- b) The right of access to the personal data we hold about you (see [section 5](#));
- c) The right to rectification if any personal data we hold about you is inaccurate or incomplete;
- d) The right to be forgotten - i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in [section 4](#), but you can ask us to delete it sooner);
- e) The right to restrict (i.e. prevent) the processing of your personal data;
- f) The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- g) The right to object to us using your personal data for particular purposes; and
- h) Rights with respect to automated decision making and profiling.

To exercise any of your rights please contact us using the details in [section 10](#).

If you have any cause for complaint about our use of your personal data, please contact us using the details provided in [section 10](#) and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a

complaint with the UK's supervisory authority, the Information Commissioner's Office (ICO). For further information about your rights, please contact the ICO or your local Citizens Advice Bureau.

### 3. What data do we collect?

Depending upon your contact with us and/or use of our website [www.vivatbacchus.co.uk](http://www.vivatbacchus.co.uk) we may collect some or all of the following personal data:

- a) Name and title;
- b) contact information: email address, telephone number, postal address;
- c) date of birth and/or age;
- d) gender;
- e) business/company name;
- f) credit or debit card information (although we do not store this ourselves);
- g) social media account ID when you interact with us on social media or when we target social media posts;
- h) your posts and messages on social media directed to Vivat Bacchus when you interact with us on social media;
- i) the communications you exchange with us (for example your emails, letters, calls or messages through our website) when you contact Vivat Bacchus or we contact you;
- j) your feedback when you voluntarily participate in customer surveys or reply to our request for feedback;
- k) website usage information is collected using Cookies and other tracking technology (see [section 8](#));
- l) when you use Vivat Bacchus guest Wi-Fi we may collect data about your device, logon durations and data downloaded and uploaded.

### 4. How do we use your data?

- a) All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Act 1998 and GDPR at all times. For more details on security see [section 6](#), below.
- b) Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to our newsletter), to comply with a legal obligation or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:
  - a. Managing your booking and supplying our products and/or services to you (please note that we require your personal data in order to enter into a contract with you);
  - b. Replying to emails, correspondence or phone calls from you;
  - c. Providing and managing your access to our website;
  - d. Supplying you with emails that you have opted into. You can unsubscribe from direct marketing at any time by following the unsubscribe link in the marketing post, emailing [marketing@vivatbacchus.co.uk](mailto:marketing@vivatbacchus.co.uk) or calling the marketing team on 0207 3532648;
  - e. Processing your job application;
  - f. Personalising and tailoring your experience on our website;
  - g. Personalising and tailoring our products and/or services for you;
  - h. Market research.
- c) Please note, we do not share your contact details and other personal data with other companies for their use for marketing purposes.
- d) You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

### 5. How can you access your data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us for more details at [marketing@vivatbacchus.co.uk](mailto:marketing@vivatbacchus.co.uk) or by post to Vivat Bacchus Ltd, 47 Farringdon Street, London EC4A 4LL.

## 6. How and where do we store your data?

- a) We only keep your personal data for as long as we need to in order to use it as described in [section 4](#), and/or for as long as we have your permission to keep it.
- b) We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.
- c) As described in [section 7](#) we may sometimes share your personal data with third parties. In such instances we require that third party to have appropriate technical and organisational measures in place to protect your personal data. However, in some instances we may be compelled by law to disclose to a third party such as local police agencies and have limited control how that is protected by that third party.
- d) The information you provide to us is held in our systems in the UK. However, we may sometimes contract with third parties that require access to some or all of your data. We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). Where we transfer any personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Act 1998 and/or GDPR.

## 7. Do we share your data?

- a) We may sometimes contract with third parties to supply services to you on our behalf. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- b) We may contract with, share some of your personal data, or obtain your personal data from, the following categories of third parties:
  - a. Credit or debit card processing (Worldpay)
  - b. Storage of credit or debit card details (Stripe)
  - c. Bookings and event purchases (Bookatable, OpenTable, FIXR, Fever)
  - d. Administering the Vivat Bacchus Loyalty Programme (Mobikon, Lightspeed)
  - e. Sending marketing eNewsletters (MailChimp)
  - f. Our website provider (Propeller)
- c) In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.
- d) We may compile statistics about the use of our website including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you.
- e) It may also be disclosed to a third party who acquires us or substantially all of our assets.

## 8. Our use of Cookies or other tracking technology

- a) Like most websites, our website uses cookies to collect information. Cookies are small data files placed on your computer or other devices (such as smart phones or tablets) to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to

- compile statistical reports on website activity.
- b) Our website may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our website.
  - c) You may disable these Cookies by changing your internet browser's settings. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
  - d) Alternatively, you may wish to visit the [AboutCookies.org](http://AboutCookies.org) website which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your machine as well as more general information about cookies.
  - e) Please be aware that some of our features may not work properly if you disable Cookies.
  - f) When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

## 9. Other websites

The Vivat Bacchus website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 10. Contacting us

If you have any questions about this Privacy Policy or would like to exercise your rights under the GDPR, please contact us by:

- email at [marketing@vivatbacchus.co.uk](mailto:marketing@vivatbacchus.co.uk)
- telephone on 0207 3532648
- post at Vivat Bacchus Ltd, 47 Farringdon Street, London EC4A 4LL

Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## 11. Changes to our privacy policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website. This Privacy Policy was last updated on 20.5.2018. We recommend that you check this page regularly to keep up-to-date.