

PRIVACY & GDPR POLICY



Purpose of this privacy policy

The Hyde Park Hotel respects your privacy and is committed to protecting your personal data.

This privacy policy provides information on how we collect and process your personal data when you visit our pub, use our website (www.hydeparkpub.co.uk) ('the website') (including any data which you may provide through the website when you contact us to provide feedback or to make a complaint) or when you use the online ordering application.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

Controller

The Hyde Park is the data controller of, and responsible for, your personal data processed through the use of our website and any data processed when visiting our pub.

Contact details

If you have any questions about this privacy policy or our privacy practices, including any requests to exercise your legal rights, contact our legal department – via e-mail or post:

Full name of legal entity: JRCRC Pub Management Ltd

E-mail address: admin@hydepark.co.uk

Postal address: 88 Mutley Plain, Plymouth, PL4 6LG

At any time, you have the right to make a data protection complaint to the relevant supervisory authority. However, before doing so, we do request that you contact us in the first instance to provide us with an opportunity to resolve the matter.

If we have been unable to resolve your concerns and you wish to lodge a complaint with a supervisory authority, these are:

- Information Commissioner's Office (www.ico.org.uk) – for the UK
- Data Protection Commission (www.dataprotection.ie) – for the Republic of Ireland

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Changes to the privacy policy and your duty to inform us of changes

This policy was last updated in April 2024 – and we aim to keep our privacy policy under regular review.

It is important that the personal data we hold about you be accurate and current. If any of the details we hold about you change, please update us, so that we can ensure that our records reflect these changes.

Third parties

Our website may include links to third-party websites, plug-ins and applications, eg links to third-party sites such as Booking.com, with which we work to provide certain services. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website plug-in and/or application which you visit.

RCRC Pub Management Ltd is not the data controller for table-service payments made via contactless devices. Contactless payments are processed in the UK via Evalon by Dojo devices. Please see their respective websites for more information about the way these companies process your personal data.

The data which we collect about you

Personal data means any information about an individual from which that person can be identified. It does not include data where identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you; which we have grouped together as follows:

- **Identity data** includes first and last names, vehicle registration number and images captured on CCTV (including body camera) footage.
- **Contact data** includes postal address, e-mail address and telephone number(s).
- **Financial data** includes (when booking a table), the card-holder's name, card type, card number, issue date (not mandatory), expiry date, issue number and CVV number.
 - In accordance with the payment card industry data security standard, financial data is not held or stored by The Hyde Park; it is passed straight to Dojo, our merchant payment provider.
- **Transaction data** includes details about payments for our products or services.
- **Technical data** includes Internet protocol addresses, browser plug-in types and versions, operating system/platform and other technology on the devices you use to access our website or to use, install or uninstall our apps. See our [cookie policy](#) for further details.
- **Usage data** includes information about how you use our website, apps and other services.

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We do not collect any **special categories of personal data** about you (this includes details about your race, ethnicity, religious/philosophical beliefs, sexual orientation, political opinions, health and genetic/biometric data).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and, when requested you fail to provide that data, we may be unable to perform the contract we have or are trying to enter into with you (eg to complete a booking for a table via our website). As a result, we may have to cancel a product or service which you have with us; if this is the case we will notify you.

How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **direct interactions** – including any information you provide to us when booking a hotel room, visiting our pubs and hotels, purchasing food and drinks in our pubs or lodging a complaint.
- **automated technologies or interactions** – as you interact with our website or apps, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this data using cookies and other similar technologies. See our [cookie policy](#) for further details.
- **third parties or publicly available sources** – we receive personal data about you from various third parties and public sources, as set out below:
 - technical data from analytics providers, such as Google, based outside of the European Economic Area (EEA)
 - contact, financial and transaction data from providers of technical, payment and delivery services, such as PayPal/Braintree

How we use your personal data

We will use your personal data only when the law allows permits it. Most commonly, we will use your personal data in the circumstances where:

- we need to perform the contract into which we are about to enter/have entered into with you (eg to place an order via our apps or to book a table via our website)
- it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests
- we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a legal basis for processing your personal data. We do not send third-party direct marketing communications to our customers.

Purposes for which we will use your personal data

The table below describes the purposes for which we may use your personal data and the legal basis for data-processing.

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Purpose/activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To register you as a new customer	(a) identity (b) contact	Performance of a contract with you
To process and deliver your food and drinks order or table booking, including: (a) managing payments, fees and charges (b) collecting and recovering money owed to us (c) sending receipts to you	(a) identity (b) contact (c) financial (d) transaction	(a) performance of a contract with you (b) necessary for our legitimate interests (to recover debts due to us)
To enable you to: (a) correspond with us via post, phone, e-mail or otherwise (b) provide feedback, submit a subject access request or lodge a complaint (c) complete a survey	(a) identity (b) contact	(a) performance of a contract with you (b) necessary for our legitimate interests (to obtain feedback from our customers, process complaints and grow our business around our customers' needs)
To use application improvement analytics to improve our website, products/services	(a) technical (b) usage	Necessary for our legitimate interests (to keep our website updated/relevant and to develop our business)
Log information – for order history and troubleshooting	(a) identity (b) technical (b) usage	(a) performance of a contract with you (b) necessary for our legitimate interests (to help resolve problems)
When using the online ordering app – in order to create unique application numbers Apple and Google assign a non-identifiable unique ID when the app is downloaded – this is used to create order history/repeat orders and to personalise the app	(a) technical (b) usage	(a) performance of a contract with you (b) necessary for our legitimate interests (to make future orders quicker, simpler and more user friendly)
Enforce or apply and end-user agreement/our 'terms of use' or to investigate potential breaches/to protect the rights, property or safety of, our customers and/or others	(a) identity (b) technical (c) usage	(a) necessary for our legitimate interests (b) compliance with legal or regulatory requirements

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Checking and verifying your identification using an ID scan machine for the prevention of crime and disorder	(a) identity	(a) compliance with legal and regulatory requirements
CCTV recording (including body-worn cameras) in the communal areas of our pub to ensure the safety of our employees and customers	(a) identity	(b) Compliance with our legal and regulatory obligations and for the prevention of crime and disorder
Sharing your name and image taken from our CCTV footage (including body-worn cameras) with responsible authorities, the police and third parties, such as Pubwatch/DISC or receiving the same information from aforementioned parties, to record and enforce a barring	(a) identity	(a) necessary for our legitimate interests (b) compliance with our legal and regulatory obligations for the prevention of crime and disorder

Cookies

You can set your browser to refuse some or all browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website or apps may become inaccessible or may not function properly. For more information about the cookies we use, see our [cookie policy](#).

Change of purpose

We will use your personal information only for the purposes for which we collect it, unless we reasonably consider that we need to use it for another purpose which is compatible with the original one.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties listed below for the purposes set out in the above table.

External third parties:

- Dojo – merchant payment provider
- Apple Pay, Google Pay and PayPal – payment methods available to customers when using the apps
- professional advisers acting as processors, including bankers, auditors and insurers, based in the EEA
- CCTV providers of systems in our pub
- Health and safety consultants which provide services for incident-reporting and -investigating

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- The Health and Safety Executive, local authorities, HMRC, law-enforcement agencies and any other central or local government bodies (in certain circumstances), where we are required to provide personal data to comply with our legal obligations or where it is requested and we may lawfully disclose it – eg for the prevention and detection of crime or to report serious health and safety incidents
- To keep our pubs/hotels safe and when customers/hotel guests are barred, images taken from our CCTV footage may be shared with pubwatch members (a national scheme set up with other operators), the police and council and secure third-party apps

We do not allow our third-party processors to use your personal data for their own purposes. We permit them to process your personal data only for specified purposes and in accordance with our instructions.

Any payment transactions carried out by us or our chosen third-party provider of payment-processing services will be encrypted.

Data security

We have appropriate security measures in place to prevent your personal data from being accidentally lost, altered, disclosed or accessed/used in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties with a business need to know. They will process your personal data only on our instruction and are subject to a duty of confidentiality.

We have implemented procedures to deal with any suspected personal data breach – where legally required to do so, we will notify you (and any applicable regulator) of a breach.

Data retention

For how long will you use my personal data?

We will retain your personal data only for as long as necessary to fulfil the purposes we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

In some circumstances, you can ask us to delete your data – see ‘Your legal rights’, below, for further information.

Your legal rights

Under certain circumstances, you have rights, under data protection laws, in relation to your personal data, as follows:

Request access to your personal data (commonly known as a ‘data subject access request’). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.

Request correction of the personal data which we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may

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need to verify the accuracy of the new data which you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for our continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. However, please note that, for specific legal reasons which will be notified to you at the time of your request (if applicable), we may not always be able to comply with your erasure request.

Object to processing of your personal data where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground, because you consider that it affects your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios where:

- you want us to establish the data's accuracy.
- our use of the data is unlawful, yet you do not want us to erase it.
- you need us to hold the data even if we no longer require it, as you need it to establish, exercise or defend legal claims.
- you have objected to our use of your data, yet we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, with your personal data in a structured, commonly used, machine-readable format. Note that this right applies only to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw consent, we may be unable to provide certain products or services to you. We will advise you, at the time you withdraw your consent, if this is the case.

If you wish to exercise any of the rights set out above, contact: admin@hydeparkub.co.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee. Alternatively, in these circumstances, we could refuse to comply with your request.

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What we may need from you

We may need to request specific information from you to help us to confirm your identity and to ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information about your request, to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month, but it could take longer – if this is the case, we will notify you and keep you updated.

Glossary

- **Legitimate interest** means the interest of our company in conducting and managing our business to enable us to give you the best service, as well as the best and most secure experience. Before we process your personal data for our legitimate interests, we ensure that we consider and balance any potential impact on you (both positive and negative) and your rights. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can contact us to obtain further information about how we assess our legitimate interests against any potential impact on you, in respect of specific activities.
- **Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps, at your request, before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.