



This is privacy notice of The Five Bells, Eastry.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how data protection law protects you.

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1. WHO WE ARE AND IMPORTANT INFORMATION

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service, reserve a table, book a room, take part in a competition.

We sometimes collect and process Sensitive Data (such as your health information, race, ethnicity) and Children's Data. See below for details. Except where set out to the contrary in another of our privacy notices (for example, our Candidate Privacy Notice for job applications), we do not collect or process any information about criminal convictions and offences.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data controller(s)

The Five Bells Eastry is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). Our contact details are The Cross, Lower Street, Eastry, Sandwich, Kent, CT13 0HX, fivebellseastry@gmail.com, 01304 611188.

For all data matters contact our data representative at fivebellseastry@gmail.com

Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

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

- **Identity Data** includes your name, username (or similar unique identification numbers that we may apply to you), email address, marital status, title, date of birth and gender
- **Contact Data** includes you billing address, delivery address, email address and telephone number(s)
- **Financial Data:** including payment card details
- **Transaction Data:** including the details of the products and services purchased and the date, time and location of sale and your purchasing activity (including vouchers and coupons activity).
- **Profile Data:** including your username and password, purchases, orders or bookings made by you, your interests, your preferences, your feedback, your survey responses, your social media content (where this is in the public domain including posts and comments, pictures and video footage) and profile information and insight from organisations that already hold information on you (such as credit reference agencies and 'customer insight companies' who give us their views on your household, your status, as well as your possible preferences and behaviours).
- **Usage Data:** including information about how you use our website, products and services (such as details of your table reservations).
- **Marketing and Communications Data:** including your preferences in receiving marketing from us and our third parties, your communication preferences and information on what you view, click on and access in and through our marketing emails, text messages and push notifications.
- **Sensitive Data:** including information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data (see below).
- **Children's Data:** including names, ages and dietary requirements of children when they attend any parties or events at one of our venues which is organised by an adult; Identity Data, Contact Data, Technical Data and Usage Data of children aged 13 or above when they log into our WiFi network ; and Sensitive Data relating to children where this is provided by you. We do not knowingly process any other data relating to children.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Sensitive Data

In certain situations we have to collect Sensitive Data about you. Under data protection law this is known as "special category" data and includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data.

When do we process Sensitive Data? We only collect and process Sensitive Data where you provide such information to us in the following situations:

- As part of any feedback and/or complaints which you raise with us, for example where you believe you have suffered a **health issue** following a visit to our premises (for example, suspected food poisoning or another health and safety incident), or where you believe we have been **discriminatory** against you (for example, discrimination based on race or sexual orientation). When you provide details of what happened, this may include giving us Sensitive Data. We are allowed to process this Sensitive Data (together with any other relevant information), to investigate, address and resolve your issue and to administer any possible legal claims or out-of-court procedures. We may process Sensitive Data relating to children in the situations set out below.

Where you are **applying for a job** with us. In this situation, we can process your Sensitive Data because it is necessary for carrying out our obligations and rights related to employment law and your working capacity; this is covered in a separate Candidate Privacy Policy which is displayed when you apply for job, and a copy of it can be provided by emailing fivebellseastry@gmail.com. We do not routinely collect and process Sensitive Data in any other situations. If we do, we will obtain your explicit consent.

Children's Data

We may collect and process Children's Data in certain situations as described below.

When do we process Children's Data? We only collect and process Children's Data in the following situations:

- for enquiring about, and booking, **children's parties and events**. When you fill out forms relating to the event you may choose to provide us with children's names, ages and dietary requirements
- where you believe you have suffered a **health issue** following a visit to our premises (for example, suspected food poisoning or another health and safety incident), or where you believe we have been **discriminatory** against you (for example, discrimination based on race or sexual orientation) where children have been involved in these situations. Again, you might provide us with children's names, ages and health information;
- where a child aged 13 or above **logs into our WiFi network**, we collect Identify Data, Contact Data, Technical Data, and Usage Data (however, only customers aged 18+ can register for a customer account with us).

We are allowed to process Children's Data where it is required for our legitimate interests (offering and hosting children's parties and other events in our venues, dealing with feedback and complaints, understanding how customers interact with our mobile apps and websites, providing safe and secure use of our online facilities) or whenever required to comply with a legal obligation; and, in any of these situations, where the processing is necessary.

Alternatively, or in addition, we may process Children's Data on the basis of **consent, given or authorised by the holder of parental responsibility** (and in these circumstances we will always make reasonable efforts to verify such consent).

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

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

- **Directly.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you purchase our products or services, book a table with us, order a takeaway, create an account with us, subscribe to our services, news, offers, promotions and updates or groups, request marketing to be sent to you, enter a competition or promotion, complete a survey or give us feedback.
- **Social Media Interactions:** our website and services may allow you to interact with them by using your social media applications. This interaction may result in us collecting some of your social media content (including posts and comments, pictures and video footage), but only where this content is in the public domain and/or where this content has been sent by you to us in a private message via social media; and also your Technical, Profile and Marketing and Communications Data.
- **Automated Technologies:** as you interact with our website and our services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Other Third Parties or Publicly Available Sources:** we may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers such as Google, advertising networks search information providers.
 - Marketing and Communications Data and Technical Data from online advertising data providers such as Google based outside the EEA.
 - Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data and Marketing and Communications Data from third party affiliate sites such as Vouchercloud and Vouchercode based in the EEA and table booking service providers such as Bookatable and Opentable based in the EEA.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Profile Data and Marketing and Communications Data from social media providers such as Facebook based inside and outside of the EEA
 - Identity, Contact and Profile Data from data brokers or aggregators.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract** this 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.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. 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).
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting our data representative at fivebellseastry@gmail.com

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<ul style="list-style-type: none"> • To register you as a new customer • to receive news, offers, promotions and updates • to receive a voucher • to make full use of our apps • when you otherwise register as one of our customers 	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Performance of a contract with you
<p>To process and deliver a product or service that you have ordered from us, including:</p> <ul style="list-style-type: none"> • online orders or orders at one of our sites • gift card purchases • when we issue a refund • to manage the payment, fees and charges • to collect and recover money owed to us • any other contractual arrangement that we agree to enter into with you 	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data • Children’s Data (only as required for booking children’s parties and events) 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests, being to recover debts due to us or, in the case of Children’s Data, to provide an event tailored to your child
<p>To tailor our direct marketing to you and to send you direct marketing communications including via:</p> <ul style="list-style-type: none"> • Email • SMS • Push Notifications 	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical Data • Transaction Data • Usage Data • Profile Data • Marketing and Communications Data 	<ul style="list-style-type: none"> • In terms of tailoring our direct marketing, necessary for our legitimate interests, being to develop our business and inform our marketing strategy • In terms of sending direct marketing where you are a customer and have not previously opted out of receiving such direct marketing, as necessary for our legitimate interests, being to offer you relevant products and services related to what we have previously provided to you • In terms of sending direct marketing where you are not one of our customers, with your consent given when you sign up to our mobile app, website or otherwise give your details and provide consent when doing so

<p>To enable you to take part in prize draws, competitions or surveys.</p>	<ul style="list-style-type: none"> • Identity Data • Contact Data • Usage Data • Profile Data • Marketing and Communications Data 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests, being to study how customers use our products and services, to develop them and grow our business
<p>To understand our customers, matching common information from various sources to build a profile of you; this may include:</p> <ul style="list-style-type: none"> • understanding your habits, where you are from time to time, your personal circumstances and those of your family or household, and the things you may like, dislike and be interested in • the ways you interact with us, such as subscribing to news, offers, promotions and updates, booking tables, completing surveys, entering competitions, using our Wi-Fi, mobile apps, browsing website pages, interacting – e.g. by likes and comments – with our social media accounts and reviewing our products and services in public forums • creating Aggregated Data 	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical Data • Transaction Data • Usage Data • Profile Data • Marketing and Communications Data • Children’s Data (limited to data concerning use of our WiFi by children aged 13+) 	<ul style="list-style-type: none"> • Necessary for our legitimate interests, being to develop our business, products, services, content and advertising campaigns to make these relevant for you, and tracking the effectiveness of our advertising campaigns
<p>To manage our relationship with you, which includes:</p> <ul style="list-style-type: none"> • to notify you about changes to our privacy policy • to communicate with you about operational changes to our products, services, websites and mobile apps, for example if we were to withdraw one of our apps • to gather feedback from you about our brands, websites, mobile apps and other services and activities from time to time • to respond to, deal with and address any questions, suggestions, issues or complaints you have raised and reporting and analysis in respect of these • to respond to any social media reviews, posts or other public comments you make about us, our brands, websites, mobile apps, services or other activities 	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data • Marketing and Communications Data • Sensitive Data (only as required for dealing with feedback and complaints about specific issues) • Children’s Data (only as required for dealing with feedback and complaints for specific issues) 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<p>To administer and protect our business and website and offer safe and secure use of our products and services, which includes:</p> <ul style="list-style-type: none"> • the process of anonymising your information so that you are no longer identifiable to us, where we no longer need your data in an identifiable form 	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical Data • Usage Data • Profile Data • Marketing and Communications Data 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests, being to run our business, ensure network security and prevent potential criminal behaviour • Necessary to comply with a legal obligation

<ul style="list-style-type: none"> • to provide safe access to our websites, mobile apps and Wi-Fi networks • to power user security measures and services, such as recognition of your usernames and passwords, as well as reset functions • to monitor security measures around our websites, mobile apps and Wi-Fi networks to check they are not being abused or threatened • to protect you and our business against potential criminal behaviour, such as fraud • to administer troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data 	<ul style="list-style-type: none"> • Children’s Data (limited to data concerning use of our WiFi by children aged 13+) 	
<p>To provide information to legal and regulatory bodies where we are under a legal or regulatory obligation to do so.</p>	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical Data • Transaction Data • Usage Data • Profile Data • Marketing and Communications Data • Sensitive Data • Children’s Data 	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our data representative at fivebellsestry@gmail.com

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- **Internal Third Parties**

- **External Service providers** (mainly acting as processors, but sometimes as controllers) who help us provide our websites, mobile apps, Wi-Fi networks and related services to you; for example, information technology companies who design and host our websites, payment services companies who enable you to use credit or payment cards with us, and data insight specialists.
- **Affiliated third parties** (acting as processors and controllers) that provide services to us such as market research, table booking, voucher supply and redemption, marketing insight services and data analytics services.
- **Rewards companies** (acting as controllers) which you have signed up to, in order for you to receive the rewards and benefits they offer.
- Any new **business partners** (acting as controllers or processors) we may have over time; for example if we enter into a joint venture, reorganisation, business merger or sale of part of our business, the other party may receive some or all of your information.
- Our **professional advisors** (acting as controllers or processors); for example, our lawyers, insurers and insurance brokers, when they need it to provide advice to us or help us obtain insurance.
- The **Police**, the Health and Safety Executive, **local authorities**, **Her Majesty's Revenue and Customs (HMRC)**, the **Courts** and any other **central or local government bodies** (acting as controllers or processors) where we are required to do so to comply with our legal obligations, or where they request it and we may lawfully disclose it, for example for the prevention and detection of crime or to report serious health and safety incidents.
- We also may share the information we collect with **other third parties** where we are legally obliged to do so; for example, to comply with a court order.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK.

7. DATA SECURITY

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

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact our data representative at fivebellsestry@gmail.com

No fee required – with some exceptions

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

What we may need from you

We may need to request specific information from you to help us confirm your identity and 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 in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 16 February 2024 and historic versions can be obtained by contacting us.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

11. QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our data representative at fivebellseastry@gmail.com

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.