

## **MALVERN INNS - OUR PRIVACY POLICY**

We are committed to protecting your privacy and to making sure your personal information is handled in a safe and responsible way.

This policy outlines how we aim to achieve this when:

- you use our websites
- you book a table to eat with us
- you book to stay with us
- you apply to work for us
- you sign up for our marketing material

### **Definition of Personal Data**

Personal Data means any information that can be used to identify a person. By providing your personal data, you agree that we can use your personal data in accordance with this policy. Please make sure you take time to read our policy and understand it.

### **Who we are**

Malvern Inns operates two pubs:

The Square & Compass (Malvern Inns Two Ltd) Rigton Hill, North Rigton, LS17 0DJ

The Castle Inn, 35 High Street (Malvern Inns Three Ltd), Spofforth, HG3 1BQ.

In addition to being a pub restaurant, The Castle Inn is a small hotel.

Malvern Events and The Harrogate Pizza Company are also part of The Castle Inn (Malvern Inns Three Ltd).

### **We collect information from you when:**

- you make a table booking or book to stay
- you make an enquiry
- you sign up to receive our email newsletter
- you log into our Wi-Fi systems

### **How your information is used**

Our use of your personal data will always have a lawful basis. Your data will be used:

- to complete a booking
- because you have consented to our use of your personal data
- because it is in our legitimate interests

We require your details to understand your needs, provide you with a better service and for:

- internal record keeping
- booking confirmation details and follow-up messages
- improving our products and services
- sending marketing communications
- customising our website

### **What type of information is collected?**

When you book a table or room we collect information such as your:

title  
name  
e-mail address  
home or work address  
billing information  
phone number  
company name  
dietary requests  
marketing preferences

When you stay or eat with us or sign up for our Email Newsletters we may collect your:

title  
name  
e-mail address  
age  
marketing preferences  
survey responses

When you access our websites or those associated with our operation, information collected may include:

device type (e.g. mobile, computer, laptop, tablet)  
operating system  
IP address  
browser type  
browser information  
domain names  
access times  
settings  
generic location

When you log in to our Wi-Fi, information collected may include your:

name  
email address  
date of birth  
age  
gender  
mobile phone number  
postcode  
device/network data and MAC address  
access times  
marketing preferences

When you sign up for our email newsletters we collect your:

name  
email address  
date of birth

### **When is Personal Data deleted?**

#### **Table Booking (ResDiary)**

Personal data will be automatically deleted after 18 months of inactivity, or on request.

#### **Room Booking (High Level Software)**

Personal data will be retained indefinitely or for the life of the contract between Malvern Inns and High Level Software. You can request that your data is deleted by emailing [samroffe@malverninns.com](mailto:samroffe@malverninns.com)

If and when the contract is cancelled, all data will be permanently deleted after 1 month.

#### **Wifi (Retail Technology Services, Purple Wifi)**

Personal data collected via the Wifi provided by Retail Technology Services at The Castle Inn Spofforth will be deleted 13 weeks from last log in. Please contact [samroffe@malverninns.com](mailto:samroffe@malverninns.com) for details of the Wifi provider for The Square & Compass.

#### **Email Newsletter (Catton Hospitality)**

Personal data will be retained to enable receipt of our monthly newsletters. You can choose to stop receiving our newsletters at any point by clicking on the unsubscribe link at the bottom of the email or by emailing [samroffe@malverninns.com](mailto:samroffe@malverninns.com)

### **Who has access to your information?**

We will not sell, distribute, or lease your personal information to third parties. Any personal information we request will be safeguarded under current legislation.

We will only share your information with companies necessary to deliver services on our behalf. This includes ResDiary (table booking management system), Inn View (table and room bookings), High Level Software (room booking management system (Catton Consulting (e-mail marketing) and third-party payment processors.

The companies we work with encrypt and securely store data they collect on our behalf.

Your personal data will be kept for as long as it is needed in order to use it as described in this privacy policy, and/or for as long as we have your permission to keep it.

## **Your choices**

We will not pass your details to any third parties for marketing purposes unless you have expressly given permission. Furthermore, you can change your marketing preferences at any time by contacting us by email at [samroffe@malverninns.com](mailto:samroffe@malverninns.com). You have a right to request a copy of the personal information we hold about you and have any inaccuracies corrected. Any such requests should be made to this email address: [samroffe@malverninns.com](mailto:samroffe@malverninns.com)

To withdraw your consent to us using your personal data at any time, and to request that we delete it, email [samroffe@malverninns.com](mailto:samroffe@malverninns.com)

## **Security**

Data security is very important to us. We and the companies supporting our operation have taken suitable measures to safeguard and secure data collected.

### **Cookies on our Wix.com websites**

Like many other websites, our Malvern Inns websites use cookies. A cookie is a small piece of data stored on your browser, usually to keep track of movements and actions on a site. The cookies help to:

- make our websites work as you would expect.
- improve the speed/security of the sites.
- track the number of people using our websites.

All internet browsers offer support and information on how to delete or block cookies. You can control and/or delete cookies as you wish by checking your browser settings. Please note that deleting cookies or disabling future cookies or tracking technologies may adversely affect the experience of using our websites.

### **Cookies on our table booking and room booking systems**

(ResDiary, High Level Software)

Our websites contain links to our table and room booking systems. Authentication, personalisation and security cookies are used to help verify your account and device and determine when you log in. This makes it easier for you to access services. Cookies are also used to help prevent fraudulent use of login credentials.

Cookies also help analyse how services are being accessed and used, and enable the performance of services to be tracked.

Cookies also provide insights regarding the performance of websites such as page views, conversion rates, device information and visitor IP addresses.

### **What happens if our business changes hands?**

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided may, where it is relevant to any part of our business that is being transferred, be transferred along with that part. The new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

### **Sharing your information within our group**

We may share your information within our group to enhance the hospitality experience we provide, tailor marketing to you and inform you of major company developments.

### **Applying for a job**

If you want to be part of one of our teams, you may submit your CV. This is likely to include your:

- personal details
- employment details
- education
- salary history
- other relevant details

We will use this information to assess your application. We may also keep it on our records for future reference. Please email [samroffe@malverninns.com](mailto:samroffe@malverninns.com) if you no longer want us to keep your CV.

### **Contact**

For more information or if you have any concerns, please email [samroffe@malverninns.com](mailto:samroffe@malverninns.com) We will use commercially reasonable efforts to promptly determine and remedy any issue.

We will update our Privacy Policy as information relating to our operation and our partners changes.

Updated 10<sup>th</sup> January 2022