

SOMERSET WHITE

PRIVACY POLICY

1. **Our commitment to privacy**

Somerset-White Limited is committed to protecting your privacy.

This privacy policy ("Privacy Policy") sets out how Somerset White Limited ("Somerset White") ("we", "us" or "our" being interpreted accordingly) uses and protects the personal information about you that we collect or you provide, whether through our website at www.somerset-white.com ("Website") or by other means.

2. **Changes to our Privacy Policy**

We may modify this Privacy Policy at any time so please check that you have seen the latest version. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You should also check any other user terms that apply to your use of this Website from time to time.

3. **Information Collected**

We collect personal information from you in various ways, for example if you:

3.1 supply information over the telephone and through written correspondence (both online and offline) when you make enquiries and reservations, or otherwise during your interactions with us;

3.2 supply information by filling in our membership profile form (both online and offline); and

3.3 use our services.

The type of personal information we collect includes your name, email address, home (or work) address or addresses, phone number, passport details, records of the services we will provide or have provided to you, details of preferences you express, family or household details, credit card or other payment details, and other information relating to you personally which you choose to provide. Some of the information you supply may include sensitive data, for example, information regarding your health or religion.

Such personal information is referred to in this Privacy Policy as "Personal Data".

If you choose not to provide Personal Data, we may not be able to comply with a request for information or services.

Once your Personal Data has been added to our database, we may also add details to your record from publicly available sources, such as press articles.

4. **Personal Data Relating to Third Parties**

Please ensure that any Personal Data you supply to us which relates to third parties, including family members, is provided to us with their consent and knowledge of our proposed use of their Personal Data.

5. **How We Store and Use Your Personal Data**

You agree to the storage of Personal Data in our databases and on our computers and in our WhatsApp conversations (when you have provided Personal Data to us in this way). Personal Data will also be stored on our secure servers, cloud storage (Azure), Last Pass and on Office 365. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

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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 and purposes:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

5.1 Transactional purposes: We will need to use your Personal Data in order to carry out our obligations arising from any contracts entered into between you and us, or at your request, before we enter into a contract.

This will include using your Personal Data in order to respond to your queries and requests, to provide and to process payments.

5.2 Personalising your services: We will use the Personal Data that we hold in order to learn more about your personal preferences and therefore improve the services we provide to, for example, we may use records of which restaurants you have chosen in the past to provide a more helpful shortlist of restaurants when we work for you in the future.

5.3 Marketing communications: Where you have expressly consented to us doing so in accordance with applicable law, we may contact you for marketing purposes electronically (e.g. email, MMS, SMS or through social media) or by telephone. We may also contact you by post from time to time, unless you have told us that you do not want to receive these communications. When we send marketing communications to you by email, you will be given an opportunity to unsubscribe from such communications. You may also opt out of receiving marketing communications from us at any time by informing us at the following email address: privacypolicy@somersetwhite.com.

5.4 Marketing analysis: We may use your Personal Data for the legitimate interest of internal marketing analysis, for example, to assess service use trends or to measure the amount of traffic to our website. We may occasionally ask you to take part in a survey, the results of which will be used for internal marketing analysis.

Generally, we do not rely on consent as a legal basis for processing your Personal Data, although we will get your consent before sending third party direct marketing communications to you and/or processing sensitive personal data.

Notwithstanding the above, we may also use your Personal Data for other purposes that you expressly consent to from time to time.

6. Disclosing to third parties

We will not disclose Personal Data to third parties without you knowing about it. The exceptions are:

6.1 where we are legally required to do so or where we need assistance of third parties data processors or IT service providers, acting under our instructions, who we may need to assist us - for example in dealing with a request you make and securely storing your Personal Data, or to conduct anti-fraud or money-laundering checks; and

6.2 where we may provide your Personal Data to a third party in the process of purchasing our company or business.

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We always aim to ensure that Personal Data is only used by those third parties for lawful purposes in accordance with this Privacy Policy.

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.

7. **International Transfers**

Personal Data that we collect may be processed by staff who are based in our US offices as referred to on this Website. Given the international nature of our organisation, by providing us with Personal Data, you agree that we may share Personal Data with our US offices in accordance with this Privacy Policy, although we will only do so in accordance with applicable law.

We may disclose your Personal Data to suppliers and other third parties who may assist us in providing services to you. Such third parties may be engaged in, amongst other things, the processing of your request for services and payment. You agree that we may share Personal Data with these third parties in accordance with this Privacy Policy, some of which may be outside the EU, although we will only do so in accordance with applicable law.

We have contracted with a third party provider, LogMeIn Inc. (known as "Last Pass") to provide a password management / information auto-fill tool, and so your Personal Data may be hosted by Last Pass in the United States. Last Pass is signed up to the EU-US Privacy Shield Framework which means that it is committed to protecting personal data to standards that are equivalent to EU legal principles for data protection and we shall aim to ensure that your data is treated to the same security standards you would expect in your own country. For more information about this, please see - <https://www.logmeininc.com/legal/privacy>.

We have also contracted with a third party provider, Microsoft Corporation, to provide Office 365 and cloud based storage via its Azure service. Should your Personal Data be processed outside the EU during the provision this service, Microsoft Corporation is also signed up to the EU-US Privacy Shield Framework. For more information about this, please see - <https://privacy.microsoft.com/en-us/privacystatement>. In all cases, Personal Data will only be disclosed to staff and third parties who share our commitment to treating Personal Data responsibly.

8. **Retention period**

We will retain certain Personal Data in respect of financial transactions for as long as the law requires us to for tax or accounting purposes (which may be up to 6 years after a particular financial transaction). In respect of the holding of Personal Data for direct marketing purposes, we will retain this in line with applicable law and guidance of competent regulatory authorities in the UK or other relevant territory. We will delete Personal Data that is no longer needed by Somerset White or will mark your data as 'do not contact' if you tell us you do not wish to be contacted in the future.

9. **Security to Protect Personal Data**

We employ appropriate technical and organisational security measures to protect your Personal Data from being accessed by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We also endeavour to take all reasonable steps to protect Personal Data from external threats. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including Personal Data) disclosed or transmitted over public networks.

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10. **Your rights**

In accordance with your legal rights under applicable law, you can request information about the Personal Data that we hold about you, what we use that Personal Data for and who it may be disclosed to.

You can also request that we:

- 10.1 correct Personal Data that we hold about you which is inaccurate or incomplete;
- 10.2 erase your Personal Data without undue delay;
- 10.3 no longer use your Personal Data for marketing purposes (please see paragraph 5.3 above); or
- 10.4 transfer your Personal Data to another organisation, for example, an alternative provider.

All of these requests may be forwarded on to a third party provider who is involved in the processing of your Personal Data.

If you would like to exercise any of the rights set out above, please write to our data protection contact at the email address in the 'Contact' section below. Where applicable law allows, we may request a fee to cover our administrative expenses in responding and may also require further information to verify your identity or locate the specific information you seek before we can respond in full.

If you are not satisfied with our response or believe we are processing your Personal Data other than in accordance with applicable law you can complain to the Information Commissioner's Office (ICO) in the United Kingdom.

11. **Contact**

If you have further queries or requests relating to how we use Personal Data please contact our data protection contact at privacypolicy@somersetwhite.com, or by post at our registered office at Somerset White Limited, 1st Floor, 591-593 Kings Road, London, United Kingdom, SW6 2EH.

12. **Governing Law**

This Privacy Policy is governed by English law. Subject to any mandatory legal rights you have under applicable law in another territory that cannot be contractually limited or excluded, you agree that any dispute relating to the subject matter, interpretation or application of this Privacy Policy is subject to the exclusive jurisdiction of the courts of England and Wales.