

Privacy Policy

1 What is this Privacy Policy for?

This privacy policy describes how and why the Bloomsbury Leisure Group of companies (www.bloomsburyleisuregroup.com) acquire and use your personal data.

For the purpose of the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (the **GDPR**), the Company is the controller of the personal data it processes about you. Each of our individual companies is registered with the Information Commissioner's Office. This policy sets out how we collect, process, store and protect your personal data.

This policy applies to customers, users of our Website, and those who make enquiries with us, from whom we process personal data.

2 How we collect your personal data

We collect personal data from you when we engage with you, whether it be in person, on the phone or via email. We also collect information when you use the Website.

The personal data we collect from you may include:

- your name, address, telephone number(s) and email address;
- CCTV images if you attend on our premises where we use CCTV recording (see under "CCTV" below).
- information about your transactions with us,
- information about your use of the Website which we collect through the use of cookies (please see "Cookies" below for further detail).

We also receive your name and email address from Cloud9 which hosts our wifi when you sign up to use WIFI in one of our venues.

3 How we use your personal data

We use your personal data in the following ways:

- to communicate with you by phone, email and post;
- to ensure that the content of the Website is presented to you effectively;
- to provide you with our services during and following your relationship with us and in order to obtain feedback from you about our services and your experience with us.

4 Our legal basis for processing

We process your personal data on the basis that it is necessary for the following purposes:

- for the performance of any contract that we enter with you or to take steps at your request prior to entering into a contract, such as when you wish to reserve a space at one of our pubs or our bowling lanes;
- for the purposes of our legitimate interests in ensuring that we provide you with the best service possible in all our interactions with you, which if you are a customer may include providing you with information about our services which may be of interest to you;
- with your consent when we ask for it and you provide it to us, such as when we get your consent for marketing purposes; and
- for compliance with any legal obligation to which we are subject.

We may send emails to customers in relation to services which we think they may be interested in, based on our knowledge of their previous use of our services. For example, if you have reserved a table at one of our pubs or played on one of our bowling lanes, we may send you special offers relating to those things in the hope that you will join us again soon.

Where we wish to send you marketing emails that are unrelated to the services you have previously used, we will first obtain your consent for us to do so. Please note that you are able to withdraw your consent at any time by contacting us using the details provided in the contact and complaints section below. This will not affect the lawfulness of any processing that was carried out based on your consent prior to it being withdrawn.

5 Sharing your personal data

We only share your personal data with third parties where it is necessary for us to do so in order to fulfil our obligations to you under our contract, or where we are required to do so in order to comply with a regulatory or legal provision. We will never sell your personal data for direct marketing.

You can find details of all the different entities referred to as the Bloomsbury Leisure Group [here](#). The various companies all provide leisure services (such as pubs, bowling lanes and hostels). You can opt-in to receive offers and updates from each of the companies by signing up here.

The Company may share personal data with the companies in the Bloomsbury Leisure Group for analysis about our users and so we can improve our services for you.

The circumstances in which we may share your personal data with other third parties includes:

- where we use a provider of services, for example in relation to our computer systems or programmes which we use for our business operations such as Design My Night for bookings;
- using security companies to monitor the CCTV we use at some of our sites; and
- where we share your personal data with our professional advisers such as insurers and lawyers.

6 CCTV

We may use CCTV monitoring and recording on some of our sites for security, crime prevention, health and safety and performance monitoring. Wherever CCTV is in operation you will be notified of this via appropriate signage. The CCTV is monitored and administered by the Company.

CCTV images which contain personal data are retained for a period of 30 days unless there is a specific requirement to retain them. The images are recorded for our internal use and will not be shared with any other third parties except where required for a specific reason.

7 Transfers of your personal data

The personal data that we collect from you will not ordinarily be transferred to, or stored at, a destination outside the European Economic Area (**EEA**).

However, if we do need to transfer your personal data outside the EEA we will take all steps reasonably necessary to ensure that any such transfer is made securely and that there is adequate protection in place in order to protect your personal data.

Please contact us if you wish to find out more; if we ever transfer your Personal Data outside the EEA you can ask us for a copy of the relevant safeguards implemented in relation to the transfer.

8 How long we will retain your personal data

We will retain your personal data for as long as is necessary for the purposes set out at section 4 above. This may vary depending on the personal data we process about you and the purpose of our processing. We expect that we will retain personal for up to six (6) years following the end of our relationship with you.

9 Changes to this policy

We may edit or amend this privacy policy from time to time. If we make any substantial changes to the ways in which we use your personal data we will notify you.

10 Other websites

The Website may, from time to time, contain links to and from other websites. If you follow a link to any other website, the website should have its own privacy policy. We do not accept any responsibility or liability for these policies.

11 Your rights

Your personal data is protected under data protection laws and you have a number of rights (explained below) which you can seek to exercise. Please contact us using the details provided in the contact and complaints section below if you have any queries in relation to your rights.

If you seek to exercise your rights we will explain to you whether or not the right applies to you; these rights do not apply in all circumstances.

- **Right of access** – You have a right to access the personal data we hold about you upon request. This is known as a "Data Subject Access Request". You can exercise this right by making a request in writing or by email using the contact details in the contact and complaints section below.
- **Right of rectification** – You can ask us to correct or update your personal data to ensure it is accurate and complete.
- **Right to erasure and right to restrict processing** – You can ask us to stop processing and/or to delete your personal data in certain circumstances (for example, where it is processed with your consent, or it is no longer necessary for us to process it).
- **Right to data portability** – You have a right to ask us to provide you with your personal data in a form that suits you, and/or to provide your information to a third party.
- **Right to object** – You have a right to object to our processing of your personal data.
- **Profiling and automated decisions** – You have a right not to be subject to automated decisions which have a legal effect and to be protected by safeguards in respect of any profiling. We do not undertake any automated decision making or profiling.
- **Right to object to direct marketing** – Where you have consented to receive direct marketing, you can change your mind at any time by contacting us or following the link to "unsubscribe" provided in each email we send to you. Please allow a few days for us to action your request.

12 Contact and Complaints

If you have any questions in relation to anything raised in this privacy policy or how we use your personal data, please contact us by writing to us at:

Data Protection Officer, Bloomsbury Leisure Group, Tavistock Hotel, London, WC1H 9EU, or email us at: dpo@bloomsburyleisuregroup.com.

You also have the right to lodge a complaint with a supervisory authority (the **ICO**) by writing to Information Commissioner's Office, Water Lane, Wilmslow, SK9 5AF or calling 0303 123 1113. Further information about how to do this can be found at: www.ico.org.uk.