#### **PRIVACY AND COOKIES**

#### **SEARCYS PRIVACY NOTICE**

Searcys website is ultimately controlled by Searcy Tansley and Company Limited (company number 00331909. We are registered in England and Wales and our registered office is 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT.

Searcys is committed to protecting and respecting your privacy. We take your privacy very seriously and we ask that you read this Privacy Notice carefully as it contains important information on:

- the personal data we collect about you;
- how we look after your personal data when you visit our website (regardless of where you visit from);
- with whom your personal data might be shared; and
- your privacy rights and how the law protects you.

#### WHO WE ARE

Searcy Tansley and Company Limited, is the controller and responsible for your personal data (collectively referred to as "Searcys", "we", "us" or "our" in this Privacy Notice). The Searcys group is made up of different legal entities such as:

- Searcy Tansley and Company Limited;
- TOB Restaurants Limited;
- Searcys 30 Euston Square Limited;
- Party Ingredients Catering Services Limited; and
  - Searcys at Horizon 22 Limited.

This Privacy Notice is issued on behalf of the Searcys' group so when we mention "Searcys", "we", "us" or "our" in this Privacy Notice, we are referring to the relevant company in the Searcys group responsible for processing your personal data.

We will let you know which entity will be the controller for your data when you purchase a product or service with us and Searcy Tansley and Company Limited is the controller and responsible for this website.

# PERSONAL DATA WHICH WE COLLECT

# Personal data provided by you

We only collect personal information that we know we will genuinely use and in accordance with the relevant Data Protection Legislation.

We collect personal data about you when you:

- book a table for one of our venues;
- book an event at one of our venues;
- register for Club 1847;
- purchase or make payments for any of our gifts or gift vouchers contact us through our website;
- apply for a job with us;
- access Wi-Fi at one of our venues;
- sign up to receive our newsletter;
- complete customer feedback or surveys; or

participate in competitions or prize draws.

- The personal data collected in the above manner may include:
- full name;
- postal address;
- email address;
- telephone number;
- payment details;
- venues which you are interested in;

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CV, covering letter and other application details; or reservation and/or booking details.

# Personal data provided by 3rd parties

We may receive information about you from other sources (such as online table and event reservation providers), which we will add to the information we already hold about you in order to help us improve how we provide our services to you.

# Special categories of personal data

We do not proactively collect special category personal data via our website such as health information. However, our website does include text boxes which are designed for you to provide us with further information, and you should be aware that information you freely submit may reveal to us certain information that may be considered special category personal information such as information relating to your allergens.

We do not ask for any special categories of personal data to be disclosed to us as part of your job application process via our website. Depending on the nature of the role, we may have to conduct further checks at a later stage and, where those checks will involve special categories of personal data, we will explain why we need that information and how we intend to use it on our recruitment and selection privacy policy.

# Personal data about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can: give consent on

- his/her behalf to the processing of his/her personal data; receive on his/her behalf any
- data protection notices;
- give consent to the transfer of his/her personal data outside the United Kingdom ("UK") and European Economic Area ("EEA"); and

## HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a legal basis, e.g.:

- a. where you have given consent;
- b. to comply with our legal and regulatory obligations;

- c. for the performance of a **contract** with you or to take steps at your request before entering into a contract; or
- d. for our **legitimate interests** or those of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests. When relying on this legal basis, we will carry out an assessment to balance our interests against yours.

The table below explains what we use your personal data for and why:

What we use your personal data for	Our legal basis
Process any orders for goods	Performance of a contract with you or to take steps to
and/or services which you make	enter into a contract at your request
with us	
Assist you with your queries in	Performance of a contract with you or to take steps at
relation to our business	your request before entering into a contract
and/or venues	
Review any job applications you	Performance of a contract with you or to take steps at
submit to us	your request before entering into a contract
Detect and prevent fraud	Compliance with our legal and regulatory obligations
Customise our website and its	Consent (where we are not required to obtain your
content to your particular	consent and do not do so, for our legitimate interests
preferences	i.e. to provide you with information (as a prospect or
	existing customer) we consider may be useful to you))
Notify you of any changes to our	Compliance with our legal and regulatory obligations
website or to our services that may	
affect you	
Provide you with marketing	Consent (where we are not required to obtain your
materials and information about	consent and do not do so, for our legitimate interests
our business and services	i.e. to provide you with information (as a prospect or
	existing customer) we consider may be useful to you))
Develop and improve our website,	Consent (where we are not required to obtain your
business and services	consent and do not do so, for our legitimate interests
	i.e. to provide you with information (as a prospect or
	existing customer) we consider may be useful to you))

#### Overview

We collect information about you so that we can:

- manage your table bookings and event bookings at our venues and ensure that we can
  provide you with a personalised and memorable experience with us;
- identify you and manage your Club 1847 membership;
- process any orders for gifts and/or gift vouchers you make with us;
- assist you with your queries in relation to our business and/or venues;
- review any job applications you submit to us;
- provide you with Wi-Fi access at our venues;

review any of your competition or prize draw entries and contact you if you are a winner; conduct research, statistical analysis, and behavioural analysis;

- carry out customer profiling and analyse your purchasing preferences (although this is only
- ever done in an anonymised manner and will not identify you specifically);
- detect and prevent fraud;
- notify you of any changes to our website or to our services that may affect you; and improve
- our services.

## Marketing

We would like to send you information by email about our products and services, competitions, surveys, prize draws and special offers which may be of interest to you.

We will send you marketing messages when you have enquired about our services or products, when you click to subscribe on our website or tick the relevant consent box and/or when you provide us with your personal data. If you have consented to receive such marketing from us, you can opt out at any time by using the unsubscribe function on each of our emails or by contacting us directly through the "Contact Us" section of this website

## WHEN WE MIGHT SHARE YOUR DATA WITH THIRD PARTIES

We do not, and will not, sell any of your personal data to any third party – including your name, address, email address or payment card information. We want to earn and maintain your trust, and we believe this is essential in order do that.

As an essential part of being able to provide our services to you, we do share your data with the following categories of third parties:

- other companies within the Searcys group, as different companies within our group are responsible for different venues;
- service providers that help us to get any purchases which you make through our website to you, such as delivery companies, gift voucher printers, payment service providers;
- service providers that provide reservation systems for our venues, such as SevenRooms,
   Design My Night and OpenTable;
- service providers that help us to run our business such as marketing agencies, website
  hosting providers, website developers, providers of Wi-Fi access at our venues and
  newsletter distributors;
- professional advisers including lawyers, bankers, auditors, and insurers who provide advice to us when we require it;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity; and
- 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 and relevant data protection legislation. 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. If you would like any more information about the third parties which we work with to provide our services to you, please contact us on the contact details provided later in this Privacy Notice.

# HOW WE ASK FOR CONSENT

In those cases where we need your consent to hold and process your personal data, we will ask you to check a box on any form requiring consent (except when subscribing to our newsletter via our website, when we will ask you to click on subscribe). By checking these boxes, you are confirming that you have been informed as to why we are collecting the information, how this information will be used, for how long the information will be kept, who else will have access to this information and what are your rights as a data subject (all of which is set out in this Privacy Notice).

#### HOW WE KEEP YOUR PERSONAL DATA SECURE

To protect your information, we have policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner, and all systems that can access the information have the necessary security measures in place.

All employees, contractors and sub-contractors receive the necessary training and resources to ensure they understand their responsibilities in relation to all our policies and procedures.

In addition, to these operational measures, we use a range of technologies and security systems to reinforce the policies and procedures, including ensuring that:

- access to personal data is strictly restricted to those employees who need access to this information as part of their role;
- we store your personal data on secure servers and unauthorised external access to personal data is prevented through the use of a firewall;
  - information used for reporting and or customer profiling purposes is anonymised (so that it does not identify you); and
  - we store your personal data on secure servers.

To make sure that these measures are suitable, we run vulnerability tests regularly. Audits to identify areas of weakness and non-compliance are routinely scheduled.

## HOW LONG WE KEEP YOUR PERSONAL DATA FOR

We shall only retain your information 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.

If you would like more information about how long we retain specific types of your information, please contact us on the contact details provided later in this Privacy Notice.

## TRANSFERS OF YOUR DATA OUTSIDE THE UK and EEA

All information you provide via our website is stored on our secure servers within the United Kingdom ("UK") and European Economic Area ("EEA"). If any data that we collect from you is transferred to, or stored at, a destination outside the UK and EEA at any time, we will update this Privacy Notice accordingly.

When you link to one of our trusted third-party reservation supplier websites via our website or to a social media site via our website, any personal data which you provide them may be transferred or stored outside the UK and EEA. Please check their websites' privacy notice carefully.

#### YOUR RIGHTS

# The right to access information we hold about you

At any point you can contact us to request the information we hold about you as well as why we have that information, who has access to the information and where we got the information.

Once we have received your request, we will respond within 30 days.

# The right to correct and update the information we hold about you

If the information we hold about you is out of date, incomplete or incorrect, you can inform us, and we will ensure that it is updated.

## The right to have your information erased

If you feel that we should no longer be using your information or that we are illegally using your information, you can request that we erase the information we hold. When we receive your request, we will confirm whether the information has been deleted or tell you the reason why it cannot be deleted.

# The right to object to processing of your information

You have the right to request that we stop processing your information. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your information to comply with your other rights.

# The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing.

## The right to data portability

You have the right to request that we transfer your information to another controller. Once we have received your request, we will comply where it is feasible to do so.

For your security we may need to verify your identity before we process your instructions above.

## **COOKIES AND TRACKING**

#### Use of cookies

A cookie is a small text file which is placed onto your device when you access our website. We use cookies on this website to:

- recognise you whenever you visit this website (this speeds up your access to the website as
  you do not have to log in each time);
- obtain information about your preferences, online movements, and use of the internet;
- carry out research and statistical analysis to help improve our content, products and services and to help us better understand our customer requirements and interests; target our marketing and statistical analysis to help improve our content, products, and services and to help us better understand our customer requirements and interested; and
- make your online experience more efficient and enjoyable.

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a product or service you have requested.

#### Consent to cookies

We will always ask for your permission to place cookies or other similar technologies on your device when you first visit our website, except where they are essential for us to provide you with a service that you have requested. You can withdraw any consent to the use of cookies or manage any other cookie preferences by using the cookies preference tool on our website. If you do this, please be aware that you may lose some of the functionality of this website.

For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: https://ico.org.uk/for-the-public/online/cookies/

#### Description of cookies

We use the following cookies and other technologies:

- Essential: These cookies are essential to the operation of our website and cannot be switched off.
- Analytics: These cookies allow us to have a better understanding of how our website is performing in terms of statistics, engagement level, content relevance and ease of navigation. We use this information to help improve our website's functionalities and content as well as your browsing experience.
- Advertising: These cookies may be set by third parties. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites, based on uniquely identifying your browser and internet device and recording your visit to our website, the pages you have visited and the links you have followed.

#### **Functional Cookies**

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

stripe_sid_,stripe_mid_	First Party
_cfuvid, vuid, player,cf_bm	Third Party
ha_userSession	Third Party
OT-Session-Update-Date, OT-SessionId, ak_bmsc, ot-cookie-check, otuvid	Third Party
Survey-Started- 73732a313520a1624r8n12cd371c3bcdc7c2, Survey- 73732a313520a1624r8n12cd371c3bcdc7c2, Survey-Started-x	Third Party
( a	_cfuvid, vuid, player,cf_bm  na_userSession  OT-Session-Update-Date, OT-SessionId, ak_bmsc, ot-cookie-check, otuvid  Survey-Started- 73732a313520a1624r8n12cd371c3bcdc7c2, Survey- 73732a313520a1624r8n12cd371c3bcdc7c2,

Cookie Subgroup	Cookies	Cookies used
	Functional Cookies	

# **Targeting Cookies**

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

Cookie Subgroup	Cookies	Cookies used
co.uk	<u>fbp</u>	First Party
searcys.co.uk	gat gtag xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	First Party
www.facebook.com		Third Party
<u>doubleclick.net</u>	IDE, test_cookie	Third Party
tripadvisor.co.uk	TAUnique, ServerPool, datadome, TAUD, TATravelInfo, TASession	Third Party
www.tripadvisor.com	SRT, TASID, TADCID,vt, TART, TASameSite, PMC, TASSK	Third Party
www.tripadvisor.co.uk	vt, TART, SRT, TASameSite, TASSK, TADCID, TASID, PMC	Third Party
instagram.com	csrftoken	Third Party

Cookie Subgroup	Cookies	Cookies used
tripadvisor.com	_abck, TAUD, TATravelInfo, bm_sz, ServerPool, TASession, TAUnique, TACds	Third Party
google.com	CONSENT	Third Party
www.youtube.com	TESTCOOKIESENABLED	Third Party
<u>youtube.com</u>	VISITOR_PRIVACY_METADATA, CONSENT, VISITOR_INFO1_LIVE, YSC	Third Party
Targeting Cookies		

# **Performance Cookies**

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

Cookie Subgroup	Cookies	Cookies used
co.uk	ga 6408V8GWSE, hjTLDTest	First Party
searcys.co.uk	hjlncludedInPageviewSample, ga 5NG2218RW5, hjSessionUser 985712, hjSession 985712, gclxxxx, ga, gid, hjIncludedInSessionSample, hjAbsoluteSessionInProgress, ga 74735XZH8R, ga xxxxxxxxxx, hjFirstSeen	First Party
nr-data.net	JSESSIONID	Third Party
rt.dotdigital-pages.com	LP-2FDE8C944BA7A63A52Z103172933DCB76185, _cflb, _cf_bm, cf_clearance, responder-52Z1-D61, Survey-Started-a9d0be3277a471716xg1536a4974f22ee5d9	Third Party
script.hotjar.com	_hjIncludedInPageviewSample, _hjIncludedInSessionSample	Third Party

## **Strictly Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Cookie Subgroup	Cookies	Cookies used
club1847.searcys.co.uk	<u>AWSALB</u> , <u>AWSALBCORS</u>	First Party
searcys.co.uk	PHPSESSID , OptanonAlertBoxClosed , OptanonConsent	First Party
m.stripe.com	m	Third Party
Strictly Necessary Cookies		

## TAKE CARE WHEN LINKING TO OUR SOCIAL MEDIA SITES

Our website provides links to our social media sites. Once on any of these social media sites, please take care if you choose to post any information as this will be on a public domain and may be widely accessible. If you would like more information about how any information posted on these sites will be used, please read the sites' privacy notice carefully.

# **HOW TO COMPLAIN**

Please contact us if you have any queries or concerns about our use of your personal data (see "Contacting us" below). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) directly. Further information, including contact details, is available at https://ico.org.uk.

## **CONTACTING US**

If you have any queries about this Privacy Notice, need further information about how Searcys use your personal data or wish to lodge a complaint, please contact us by any of the following means:

email us at: <u>dataprotection@wshlimited.com</u>

write to us at: Searcys, 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT contact us using our "Contact us" page on the website.

# **CHANGES TO THIS PRIVACY NOTICE**

We may change this Privacy Notice from time to time. You should check this Privacy Notice occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.

Where we have made any changes to this Privacy Notice which affects the manner in which we use your personal data, we will contact you by email to inform you of this change. This Privacy Notice was last updated on  $21^{st}$  June 2024