

## **The Chapter - Privacy Policy**

At The Chapter we are committed to maintaining the trust and confidence of visitors to our website. In particular we want you to know that we do not pass on your data to third parties for marketing purposes. This Privacy Policy provides clear information about when and how we collect your personal data, how we use it, how long we keep it and how you can update your data.

### **Who we are**

Liberty City Pub Company Ltd (The Chapter)

Company Number: 09359989

Registered Office: 2 Wardrobe Place, London, EC4V SAH

Name of data privacy manager: Phil Sutton

Postal address: The Chapter, c/o 2 Wardrobe Place, London, EC4V SAH

Telephone number: 0207 099 5173

You have the right to make a complaint at any time to the Information Commissioners Office (ICO), the UK Advisory Authority for data protection issues. ([www.ico.org.uk](http://www.ico.org.uk)) We would however appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **How do we collect personal data from you?**

We obtain personal data from you when you use our website, when you contact us about services, submit information directly via sign up forms, when you make a booking or purchase or if you sign up to receive our newsletters.

### ***Website Cookies***

Like many other websites, The Chapter website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that websites to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies of may result in a loss of functionality when using our website.

### ***Google analytics***

When someone visits The Chapter website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make any attempt to find out the identities of those visiting our website.

### ***Mailing lists***

As part of the accommodation booking process, via online purchases, from forms on our website and sign up to our e-newsletter, we collect personal information.

We use that information for various reasons: to tell you about great offers and events and other news and occasionally to check our records are right and to check every

our website and sign up to our e-newsletter, we collect personal information.

We use that information for various reasons: to tell you about great offers and events and other news and occasionally to check our records are right and to check every now and then that you're happy and satisfied. We do not share email lists with other organisations and businesses.

We use a third-party provider, Mail Chimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see Mail Chimp privacy notice.

You can unsubscribe from our newsletters at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing: [hello@mosaicpubanddining.com](mailto:hello@mosaicpubanddining.com)

### **Types of data we collect**

The personal information we collect might include your name, address, email address, IP address, telephone numbers and information regarding what website pages are accessed and when. If you make a purchase, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

We do not collect any special categories of personal data about you, this includes details about your race, ethnicity, religious or philosophical beliefs, political opinions, trade union membership, nor do we collect any information about criminal convictions and offences.

Sometimes we need to collect personal data by law, or under the terms of the contract with have with you. If you fail to provide that data when we request it, 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 the product or service with you but we will notify you if this is the case at the time.

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

We may use your information:

- To ensure that the content on the site is presented in the most efficient way for you and the computer that you are using
- To enable you to participate in interactive features of the site
- To provide you with information relating to our website, product or our services that you request from us
- To provide you with information on other products that we feel may be of interest to you in line with those you have previously expressed an interest in via our website
- To process a booking you have made
- To meet our obligations arising from any contracts entered into by you and us
- For dealing with entries into a competition
- To seek your views or comments on the services we provide
- To notify you about any changes to our website, including improvements, and service or product changes
- To send you communications which you have requested and that may be of interest to you. These may include information about stays, events, promotions, offers, job offers, information about the hotel and the surrounding area and replies to requests and bookings enquiries/confirmations
- For our internal purposes including statistical or survey purposes, quality control, site performance and evaluation in order to improve our website
- To administer this website
- If you consent, to notify you of products or special offers that may be of interest to you.

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## **Sharing your data**

Your privacy is important to us and we confirm that we will never release your personal details any third party for their mailing and marketing purposes.

### ***Third Parties and Service Providers working on our behalf:***

We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process payments and send you email). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond The Chapter for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to release information to a third party by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

### ***Third Party Product Providers we work in association with:***

We work with carefully selected online booking partners. When you enquire about us or book with these third parties, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third-party product providers will share required information about you with us (e.g. room type purchased and dates of stay) which we will use in accordance with this Privacy Policy.

When you are using our secure online booking system, your purchase is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers.

We will take steps with the aim of ensuring that your privacy rights continue to be protected in accordance with the law.

If you have any questions regarding secure transactions, please contact us.

## **Data security and access to your personal information**

We have put in place appropriate security measure 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 and need to know. They would only process your personal data on our instructions and they are subject a duty of confidentiality.

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

The accuracy of your information is important to us. If you change email address, or

to do so.

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [hello@mosaicpubanddining.com](mailto:hello@mosaicpubanddining.com)

Or write to us at: The Chapter, c/o 2 Wardrobe Place, London, EC4V 5AH  
Alternatively, you can telephone: 0207 099 5173

You have the right to ask for a copy of the information The Chapter holds about you.

### **How long do we keep your personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements. By law we have to keep basic information about our customers for tax purposes for six years after they cease to be a customer. The data we keep may include contact, identity, financial and transaction data)

In some circumstances you ask us to delete your data and we will do this subject to any legal obligation on us to retain it.

### **Your legal rights and how to opt out.**

You have the right to:

**Request access to your personal data**, this enable you to receive a copy of the personal data we hold about you and to check we are processing it lawfully.

**Request correction** of the personal data we hold about you, this enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below) where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however that we may not always be able to comply with your request of reassurance for specific legal reasons which will be notified to you, if applicable at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms e.g. a requirement imposed on us by law.

**Request restriction of processing or your personal data.** In some cases, e.g. if there is a question over accuracy, lawfulness, the requirement to hold data or you have objected to our use of your data you may ask us to suspend the processing of your personal data.

**Request the transfer of your personal data to you or to a third party.** If required we will provide you or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note, this right only applies to automated information which you initially provided consent for us to use or where we use the information to perform a contract with you.

Withdraw consent at anytime where we are relying on consent to process your

use the information to perform a contract with you.

Withdraw consent at anytime where we are relying on consent to process your personal data. However this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent we may not be able to provide certain products or services to you. We will advise you if this is the case at the time we withdraw your consent.

### **Opt out**

You have a choice about whether or not you wish to receive information from us.

If you no longer want to receive direct marketing communications from us then you can change your preferences or completely unsubscribe in one of two ways:

- Click the 'unsubscribe' or 'change preferences' link at the bottom of marketing emails sent to you
- Email [hello@mosaicpubanddining.com](mailto:hello@mosaicpubanddining.com) or telephone 0207 099 5173 and we will process your request within 7 days

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent.

### **Links to other websites**

Our website may contain links to other websites, plug-ins and applications run by other organisations. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. This privacy policy applies only to our website and what we do, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **16 or under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, advise us and confirm that you have your parent/guardian's permission beforehand whenever you provide us with personal information.

### **Changes to this privacy notice and your duty to inform us of changes.**

We keep this Policy under regular review. This Privacy Policy is version 2 and was last updated in May 2018.

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