

The Paddle Highcliffe

Privacy Policy

1. Introduction This privacy notice sets out how we collect and process your personal data through your use of our website www.thepaddle.co.uk and other means, including any information you may provide through our site when you sign up to our newsletter, make an enquiry or book a table. By providing us with your data, you warrant to us that you are over 13 years of age. The Paddle is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). Contact Details Full name of legal entity: The Paddle Email address: info@thepaddle.co.uk Postal address: The Paddle, 397 Waterford Road, Highcliffe, BH23 5JN. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

2. What personal data we collect about you Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows: • Identity Data: may include your first name, last name and title. • Contact Data: may include your invoice address and email address. • Transaction Data: may include details about payments between us and other details (2)

3. How we collect your personal data We collect data about you through a variety of different methods including: • direct interactions: You may provide data by filling in forms on our website, www.thepaddle.co.uk or by communicating with us by post, phone, email or otherwise, including when you: o book a table; o subscribe to our newsletters; o request menus, terms or marketing to be sent to you; o enter a competition, promotion or survey; or o give us feedback. • Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below: • technical data from the following parties: o analytics providers such as Google based outside the EU; o advertising networks such as Facebook based outside the EU; o search information providers such as Google based outside the EU; o email list provider ConstantContact based outside the EU;

4. How we use your personal data

We will only use your personal data when legally permitted. The most common uses of your personal data are: • Where we need to perform the contract between us. • 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 or regulatory obligation. Generally, we do not rely on consent as a legal ground for processing your personal data. We rely on legitimate interest in relation to sending marketing communications to you via email. You have the right to withdraw consent to marketing at any time by emailing us at info@thepaddle.co.uk or by clicking unsubscribe at the bottom of each of our marketing emails. Purposes for processing your personal data Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant. (3) We may process your

personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at info@thepaddle.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process your booking including:	(a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include:	(a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

Marketing communications You will receive marketing communications from us if you have:

- subscribed to our newsletter
- booked a table via our website.

We rely on legitimate interest to continue sending you marketing emails to let you know of any events that we are running. You have the right to withdraw consent to marketing at any time by emailing us at info@thepaddle.co.uk or by clicking unsubscribe at the bottom of our emails. We will never share your personal data with any third party for marketing purposes.

Change of purpose We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- (5) • HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Constant contact, to allow us to send newsletters, invites and information about upcoming events. We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. Data Security

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7. Data Retention

We will only keep your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data: see below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.

(6) • Right to withdraw consent. You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulationgdpr/individual-rights/> If you wish to exercise any of the rights set out above, please email us at info@thepaddle.co.uk You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to

any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one week. Occasionally it may take us longer than a week if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.