

Balls Brothers Privacy Policy

We are committed to protecting and respecting your privacy.

This notice (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We, us and our refer to Balls Brothers (Emporium) Limited, trading as Balls Brothers.

We are registered in England and Wales under company number 07000712. Our registered office is at Clareville House, 26-27 Oxendon Street, London SW1Y 4EL. We operate the following websites: <https://www.ballsbrothers.co.uk/> and www.thesterlingbar.co.uk

The data controller is Balls Brothers (Emporium) Limited of Clareville, 26-27 Oxendon Street, London SW1Y 4EL. Our VAT number is 264961866.

Balls Brothers (Emporium) Limited is part of the Novus group of companies (“Novus Group”) details of which can be found on our website: www.novusbars.com. This Privacy Notice is issued on behalf of the Novus Group so when we refer to ‘we’, ‘us’ or ‘our’ in this notice we are referring to the relevant company in the Novus Group responsible for processing your data.

Our Data Protection Officer is Samantha Delamore who can be contacted by email at Data.Request@novusleisure.com by telephone on 020 7968 2400, or by post at Clareville House, 26-27 Oxendon Street, London SW1Y 4EL.

Information we collect from you

We will collect and process the following data about you:

Information you give us. This is information about you that you give us in person or by filling in forms in venue or on our website or when you access our wifi network in venue or by corresponding with us in person, by phone, e-mail or otherwise.

It includes information you provide when you:

- speak to our staff in venue
- use our site;
- use our services;
- subscribe to any services offered by us or register for our events; and/or
- register to receive our downloadable information, newsletters or other information.
- register to use our wifi in venue
- make a complaint or involved in an accident, incident or near miss.
- ID scanning on the door

We may also collect video footage captured by our CCTV (closed circuit television system) and audio and video footage captured by staff wearing body worn cameras in some venues. The information you give us may include contact and identity data such name, email, phone number, address and date of birth.

We may collect special categories of personal information for accident, incident or near miss reporting, ID scanning, CCTV and Body Worn video footage such as race, ethnic origin, politics, religion, and health.

Information we collect about you.

We may collect financial and transaction data including payment card details, the details of the products and services purchased and the date, time and location of sale and your purchasing activity (including vouchers and coupons activity).

With regard to each of your visits to our website we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including items you viewed or searched for, page response times, length of visits to certain pages and any phone number used to call our customer service number.

Information we receive from other sources. This is information we receive about you:

- if you are a user of our services;
- if you use any other websites we or our group companies operate; and
- from our third party service providers (including, for example, contractors in technical and delivery services, analytics providers, search information providers).

If you are a user, have been a user of our services or make enquiries about the services we offer your personal details will be recorded on our CRM database and we will cross-check information you give us with the information recorded on our CRM database.

Third Party Links

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Cookies

Our website use cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy available on our websites.

Purpose for processing your information

We need to know basic personal information in order to provide you with the services that you have engaged us to provide and to assert our right to be compensated in return for those services as per the terms and conditions on our website.

Where you have given us your consent, we may send you information about other products that may be of interest to you by post, email, SMS or contact you by phone (see Marketing Activities below).

We will not use your personal data for any other purpose unless you explicitly instruct it to do so.

All the personal data we hold about you will be processed by personnel within either the United Kingdom or the European Economic Area (EEA).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Please be aware that your information may be stored on a cloud based system whose servers are located within the European Economic Area (EEA).

Personal Data that we hold.

We will use this information:

- to send you any information you have requested;
- to provide you with the services you have requested such as your booking or enquiry;
- where you have given your agreement, to provide you with news and information which we think may be of interest to you and with information about our products and services. If you no longer wish us to use your data in this way, please let us know by contacting us at Data.Request@novusleisure.com or by selecting the unsubscribe button on our communications;
- for the purposes of market mapping and customer base analysis so that we understand the potential market for our goods and services better and can tailor our goods and services to meet market and customer desires;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our services, when you choose to do so; and
- as part of our efforts to keep our site secure.
- as part of our statutory obligations.

Profiling

To ensure our communication is relevant to our customer database we collect data from several sources to create a single customer record. This single customer record allows us to combine multiple sources of information to build a customer profile about you, including:

- What brands or venues you interact with
- The frequency you visit brands/ venues
- What locations you usually visit
- Your preferred products
- Your preferred occasions (types of visits such as after work drinks or corporate events)
- When your birthday is
- Where you live
- The feedback you have provided
- What company you work for

To make sure that the communications we send you is relevant, we may use the above information to create segments and send targeted communications (if you have agreed to marketing communication).

We may also use the information within your customer profile to apply demographic profiles provided by third parties. This enables us to build an overall view of a customer segment by cross referencing our information with national demographics trends.

Legal basis for processing your information

We will not rent, swap or sell your personal information to other organisations for them to use in their own marketing activities.

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- where you have provided your consent to allow us to use your data in a certain way;
- where the processing is necessary to carry out for the performance of a contract with you;
- where the processing is necessary in order for us to comply with a legal obligation; or
- where it is in our legitimate interests to perform our functions.

Sharing your information

We may pass your personal data on to third-party service providers contracted to us in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

We may also share your personal information with:

- any member of the Novus group of companies which includes A3D2, Balls Brothers (Emporium) Limited, Novus Leisure Limited, Novus Leisure Group Limited, Tank and Paddle Limited, Late Night London Limited, Trinity Bars Services Limited and Mabels Bars Limited; or any new business partners we may have over time.
- analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may also disclose your personal information to third parties:

- Such as Statutory bodies such as but not limited to Police, local authorities, Health and Safety Executive, Her Majesty's Revenue and Customs (HMRC), the Courts and any other central or local government bodies
- If we or all or any asset or assets are acquired by a third party, in which case personal data held about our prospects and customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms of use which you can find on our website or other agreements entered into with us;
- to protect the rights, property, or safety of us, our group companies, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- if you make a claim against us (such as our legal advisors and insurance providers).
- such as our professional advisors for example, our lawyers, safety consultants, insurers and insurance brokers, when they need it to provide advice to us or help us obtain insurance.

Retention of your personal data

We will only keep your personal data within the timeframes allowed by law and for so long

as is necessary to comply with our legal obligations. The length of time we keep your data will depend on the type of personal data we have collected. It will be kept in accordance with our Retention Policy. Please contact us at Data.Request@novusleisure.com for details of any specific retention period.

Marketing activities

Where you give us your consent, we will also use your personal data in order to send you marketing communications in connection with the following marketing activities and services:

- newsletters – to keep you up to date with our news and activities;
- offers - offers and discounts at our venues; and
- promotional Information - information on our venue promotions.

You decide how you want us to contact you, whether by mail, email or by phone or text message (SMS/MMS) and you can update your communication preferences at any time by telling us when things change. From time to time we will also send you a communication to update and refresh your communication preferences.

Your rights

At any point while we are in possession of or processing your personal data, you have the following rights:

- right of access – you have the right to request a copy of the information that we hold about you;
- right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete;
- right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records;
- right to restriction of processing – where certain conditions apply to have a right to restrict the processing;
- right of portability – you have the right to have the data we hold about you transferred to another organisation;
- right to object – you have the right to object to certain types of processing such as direct marketing;
- right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling;
- right to judicial review - in the event that we refuse your request under rights of access, we will provide you with a reason as to why;
- you have the right to lodge a complaint with the Information Commissioner's Office if you have a concern about your personal data: <https://ico.org.uk/concerns/>.

You can exercise your rights at any time by contacting us at Data.Request@novusleisure.com or by phoning 020 7968 2400. You may also withdraw your consent to direct marketing by clicking the unsubscribe button on any of our communications.

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

Contact – if you have any questions, comments or requests regarding this privacy policy please contact us either by email at Data.Request@novusleisure.com or by phone on 020 7968 2400.

03/07/2018