



1. Privacy Policy

It is important to LT Pub Management plc that you understand and are happy with how we collect and process your personal data. Please take your time to read this policy in full, as this privacy policy, together with any other documents we refer to in it, aims to give you information on how we collect and process your personal data through use of our websites and our services.

Our websites and apps aren't intended for children under the age of 13 and we don't knowingly collect data relating to children through these systems.

1.1 Who we are

LT Pub Management is made up of a group of legal entities (the LT Group). This privacy notice is issued by LT Pub Management plc, a registered limited company registered in England and Wales with company number **07139073** and whose registered office is at 31 Haverscroft Industrial Estate, New Road, Attleborough, Norfolk NR17 1YE and is for use amongst the LT Group. LT Group companies are listed below:

LT Management Services Limited – company number **02159755** – same registered office as LT Pub Management plc

LT Pub Support Services Limited – company number **07139145** – same registered office as LT Pub Management plc

References to 'us', 'our' and 'we' in this Policy are applicable to the LT Group unless the context provides otherwise.

By contacting us, using our services or visiting our website, which is owned and controlled by us, you are accepting and consenting to the practices described in this policy unless you inform us otherwise. For any questions relating to this privacy notice, including any requests to exercise your legal rights, please contact us using the details below.



1.2 Contact Details

LT Pub Management operates and provides management services to businesses. Where LT Pub Management is the data processor this privacy notice does not apply to the activities of businesses who are clients of LT Pub Management or of tenants of LT Pub Management clients, or to websites operated by those clients or tenants. Please refer to the privacy notices issued by such businesses or tenants for information on their practices with respect to personal data.

Our Data Protection Officer is Ben Waterton, who can be contacted by emailing dataprotection@ltmanagement.com, or you can write to us at LT Pub Management plc, 31 Haverscroft Industrial Estate, New Road, Attleborough NR17 1YE. We are the controller and responsible for your personal data (referred to as "we", "us" or "our" in this privacy policy).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the supervisory authority for data protection issues in the UK (phone: 0303 123 1113 or at <https://ico.org.uk/concerns>). However, we would appreciate the chance to deal with your concerns before you approach the ICO, so please feel free to contact us in the first instance.

1.3 Changes to the Privacy Notice

We may change this policy from time to time as the law and/or our business changes and develops. We will endeavour to inform you of material changes to this policy. Otherwise, please look out for notifications on our website which indicate we have made a change. If you continue to use our website after we have changed the policy, we will take this as indication that you accept the changes. The version number and any changes made will be outlined in the change control section of this document.

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

1.4 Third Party Links

Our websites 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.



2. The Personal Data We Process

2.1 Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you and we record all telephone calls you make to us via our direct line telephone numbers (please note that we turn off call recording when taking card or bank details from you); which we have categorised as follows:

- **Identity Data:** including your name, username (or similar unique identification numbers that we may apply to you), email address, title, date of birth and gender.
- **Contact Data:** including your address, email address and telephone number(s).
- **Financial Data:** including payment card details.
- **Transaction Data:** including 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).
- **Technical Data:** including information we collect through your use of our websites, how often you visit and use our websites, technical information about the devices you use to access our websites (including your device's unique identifying codes (e.g. its "MAC" address), relevant IP address, operating system and version, web browser and version, and geographic location).
- **Profile Data:** including your username and password, purchases, your interests, your preferences, your feedback, your survey responses, your social media content (where this is in the public domain including posts and comments, pictures and video footage) and profile information and insight from organisations that already hold information on you (such as credit reference agencies and 'customer insight companies' who give us their views on your household, your status, as well as your possible preferences and behaviours).
- **Usage Data:** including information about how you use our website, products and services.
- **Marketing and Communications Data:** including your preferences in receiving marketing from us and our third parties, your communication preferences and information on what you view, click on and access in and through our marketing emails, text messages and push notifications.

Subject to the information contained in section 3 below, we do not collect any **Special Categories of Personal Data** about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, and information about your health and genetic and biometric data. We also do not knowingly process any data relating to children save as outlined in section 3.2 below.



2.2 If you don't provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

You don't have to give us any of your personal data but, if you don't, you may not receive our optimal customer service experience. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you.

2.3 Keeping your data up to date

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

3. Sensitive Data

In certain situations, we must collect Sensitive Data about you. Under data protection law this is known as "special category" data and includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data.

3.1 We only collect and process Sensitive Data where you provide such information to us in the following situations:

3.1.1 As part of any **feedback** and/or **complaints** which you raise with us, for example:

- Where you believe you have suffered a health issue following a visit to one of our venues (i.e. suspected food poisoning or another health and safety incident),
- Where you believe we have been discriminatory against you (i.e. discrimination based on race or sexual orientation).

When you provide details of what happened, this may include giving us Sensitive Data. We can process this Sensitive Data (together with any other relevant information), to investigate, address and resolve your issue and to administer any possible legal claims or out-of-court procedures.

3.1.2 Where you are **applying for a job** with us.



In this situation, we can process your Sensitive Data because it is necessary for carrying out our obligations and rights related to employment law and your working capacity.

We do not routinely collect and process Sensitive Data in any other situations. If we do, we will obtain your explicit consent.

3.2 Children's Data

Children need particular protection where their data is collected and processed. We may collect and process Children's Data in certain situations as described below.

3.2.1 We only collect and process Children's Data in the following situations:

- For enquiring about, and booking, **children's parties and events**. When you fill out forms relating to the event you may choose to provide us with children's names, ages and dietary requirements.
- Where you believe you have suffered a **health issue** following a visit to one of our venues (for example, suspected food poisoning or another health and safety incident).
- Where you believe we have been **discriminatory** against you (for example, discrimination based on race or sexual orientation) where children have been involved in these situations. Again, you might provide us with children's names, ages and health information;
- Where a child aged 13 or above **logs into our WiFi network**, we collect Identify Data, Contact Data, Technical Data, and Usage Data (however, only customers aged 18+ can register for a customer account with us).

We are allowed to process Children's Data where it is required for our legitimate interests (dealing with feedback and complaints and understanding how customers interact with our websites), where it is required for the performance of a contract (where a customer makes a booking for a children's party and chooses to provide children's data) or whenever required to comply with a legal obligation; and, in any of these situations, where the processing is necessary.

Alternatively, or in addition, we may process Children's Data based on **consent, given or authorised by the holder of parental responsibility** (and in these circumstances we will always make reasonable efforts to verify such consent).



4. How we collect Personal Data

We use different methods to collect data from and about you including through:

4.1 Direct interactions

You may give us your Identity, Contact, Financial, Profile and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:

- purchase our products or services;
- book a table with us;
- subscribe to our mailing lists or newsletters;
- request marketing to be sent to you;
- take part in a competition, promotion or survey; or
- give us some feedback.

4.2 Social Media Interactions

Our website and services may allow you to interact with them by using your social media applications. This interaction may result in us collecting some of your social media content (including posts and comments, pictures and video footage), but only where this content is in the public domain and/or where this content has been sent by you to us in a private message via social media; and, your Technical, Profile and Marketing and Communications Data. If you choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy notice of every website or forum that you visit or use.



4.3 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 analytics providers such as Google, advertising networks search information providers.
- Marketing and Communications Data and Technical Data from online advertising data providers such as Google based outside the EEA.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Profile Data and Marketing and Communications Data from social media providers such as Facebook based inside and outside of the EEA.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.

5. How We Process Your Personal Data

We only process your personal data when allowed to do so by law. Most commonly, we will process your personal data:

- With your consent. Please remember, you have the right to withdraw your consent at any time by contacting us.
- Where we need to perform the contract, we are about to enter or have entered with you.
- 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.

5.1 The below table sets out how we process your personal data. Please contact us if you would like further information about the specific basis for processing.

Activity	Personal Data	Basis for Processing
To register you as a new customer and manage your account: including to receive news, offers, promotions, to receive a voucher, to enter a prize draw or survey	Identity Data, Contact Data, Profile Data, Marketing & Communications	To perform our contract with you. We can't process the activity if we don't know who you are. We have a legitimate interest to study how customers use



Activity	Personal Data	Basis for Processing
To tailor our marketing to you including SMS, Push Notification and Email.	Identity Data, Contact Data, Technical Data, Transaction Data, Usage Data, Profile Data, Marketing & Communications Data	our products and services, to develop them and grow our business We have a legitimate interest - to make it easier for you to be informed and to tailor our marketing and business strategy to customer needs. Being able to offer you services related to what we have previously provided you. And for new customers, with your consent when you sign up for the new information.
To understand our customers, using various sources to build a profile of you; this may include: understanding your habits, your location, your personal circumstances, and the things you may like or dislike. The ways you interact with us, such as subscribing to news, offers, promotions and updates, completing surveys, entering competitions, using our Wi-Fi, browsing website pages, interacting – e.g. by likes and comments – with our social media accounts and reviewing our products and services in public forums Creating Aggregated Data	Identity Data, Contact Data, Technical Data, Transaction Data, Usage Data, Profile Data, Marketing and Communications Data	This is a legitimate business interest, being to develop our business, products, services, relevant campaigns and tracking the effectiveness of our tools and campaigns.
To process and deliver a product or service that you have ordered from us, including: gift card purchases, when we issue a refund; to manage the payment, fees and charges; to collect and recover money owed to us; any other contractual arrangement that we agree to enter with you and with Third Party Contacts listed below in Section 5.2	Identity Data, Contact Data, Financial Data, Transaction Data, Children’s Data (only as required for booking children’s parties and events)	To perform our contract with you. Necessary for our legitimate interests, being to recover debts due to us



Activity	Personal Data	Basis for Processing
To take payments and give refunds	Financial data	To perform our contract with you.
To send you service messages, such as when we need to tell you about an update our privacy notice	Identity Data, Contact Data	We've got a legal obligation to provide you with updated privacy notice information.
To provide customer service and support	Transactional Data, Identity Data, Contact Data, Profile Data, Sensitive Data (where this is provided by you)	To perform our contract with you. You expect (and we want to deliver) the best possible customer service.

5.2 Third Party Contacts We May Use

Below is a list of Third Party Contacts we may use:

- Repair Contractors
- Lawyers and Legal Agencies
- IT Contractors
- Health and Safety Contractors
- Gaming Machine Suppliers
- Food and Beverage Suppliers
- Insurance Brokers and Insurance Companies
- Recruitment Agencies
- Training Suppliers

5.3 Marketing Messages and Promotional Offers

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

You will receive marketing communications from us if you have said that we can send them to you when you provided us with your details when you entered a competition, signed up for a newsletter, loyalty scheme or used our Wi-Fi.

You can tell us that you want to stop receiving marketing communications from us at any time. You can do this by contacting us directly by email to enquiries@ltmanagement.com, post or over the phone.



We'll process any such request as quickly as we can, but it might take a few days for all our systems to be updated.

5.4 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. We regularly review and, where necessary, update our privacy information, if we need to use your personal data for a new purpose, we update our privacy information, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Sharing Your Personal Data

We do not and will not, sell any of your personal data to any third party – including your name and contact details and your payment information. We're committed to protecting your privacy – we want to earn and maintain your trust, and we believe this is absolutely essential in order do that.

We cannot however, run our business or provide many of the services and benefits you expect to receive without involving other people and businesses. We only share your information in accordance with the laws applicable to us and for the purposes set out in the table in above.

6.1 We share your personal data with:

- All of LT Group including new companies, brands or outlets we might acquire in the future (acting as controllers or processors) who are all based in the EEA and who provide IT, HR, system administration services and for whom you may have agreed can provide you with marketing communications.
- Service providers (mainly acting as processors, but sometimes as controllers) who help us provide our websites, Wi-Fi networks and related services to you; for example, information technology companies who design and host our websites, payment services companies who enable you to use credit or payment cards with us, and data insight specialists.



- Affiliated third parties (acting as processors and controllers) that provide services to us such as market research, marketing agencies, advertising partners, voucher supply and redemption, loyalty supply, marketing insight services and data analytics services.
- Any new business partners (acting as controllers or processors) we may have over time; for example, if we enter into a joint venture, reorganisation, business merger or sale of part of our business, the other party may receive some or all your information.
- Our professional advisors (acting as controllers or processors); for example, our lawyers, insurers and insurance brokers, when they need it to provide advice to us or help us obtain insurance.
- The Police, the Health and Safety Executive, local authorities, Her Majesty's Revenue and Customs (HMRC), the Courts and any other central or local government bodies (acting as controllers or processors) where we are required to do so to comply with our legal obligations, or where they request it and we may lawfully disclose it, for example for the prevention and detection of crime or to report serious health and safety incidents.

6.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

7. Send Your Data to Countries Outside of Europe

Sometimes we might need to transfer your personal data to third-party processors outside the European Economic Area (EEA) – for example, this might be required to process your payment details or provide support services.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.



Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. Keeping Your Personal Data Secure

We take the security of your personal data very seriously and have in place appropriate security measures at all times, including where we share your information with our suppliers and partners, to protect 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 need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Please take care of your own information. For security tips and tricks when using the internet, Wi-Fi and smartphones or tablets, please visit www.getsafeonline.org.

9. How Long We Keep Your Personal Data For

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.

In some circumstances, you can ask us to delete your data: see the section detailing your legal rights 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.

We can only keep your personal data for as long as necessary for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.



We regularly review our retention periods to ensure that we are not keeping your data for longer than necessary. Details of retention periods for different aspects of your personal data are available by contacting us.

10. Your Legal Rights

You have lots of legal rights relating to your personal data. In certain circumstances, you may have the right to request access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object to and/or restrict our processing of your personal data. Details of the rights are set out below.

10.1 Your Legal Rights:

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision.
- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Rectification:** you may request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Delete:** you may request deletion of the personal data that we hold about you. This enables you to ask us to delete or remove 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 erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object:** you may object to how we are processing 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.



- **Restriction:** you may request that we restrict how we process your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdrawal of Consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw May 2018 Privacy Policy Page 16 of 16 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 you withdraw your consent.

The ICO regulates most UK data and information laws. To learn more about your rights, visit the ICO website at <https://ico.org.uk/>.

10.2 No Fee Usually Required

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 could refuse to comply with your request in these circumstances.

10.3 What We May Need From You

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.

10.4 Time to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.



10.4 GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

10.5 CHANGE CONTROL

Version 2 – September 2020 – Change of Data Protection Officer