

PRIVACY POLICY

What is this Privacy policy for?

This policy explains what we do with your personal data and the steps we take to keep it secure. It explains when and how we collect personal data, who we share it with, how we process it and what your rights are in respect of this.

The Colours Holbeton Ltd

The Colours Holbeton Ltd is the Company which runs the Mildmay Colours pub. The Company registration number is: 12258416
Our ICO registration number is **ZA617472**

When we say 'we', 'us' or 'our' in this notice, we are referring to The Colours Holbeton Ltd. We are the data controller in respect of this website and the services described in this policy notice.

When do we use your personal data?

In order to provide you with a good customer experience we wish to keep you up to date with the products and services we provide, events and special offers, and of course keep you safe whilst you visit our pub. We also currently separately collect your name and number for the Track and Trace scheme and where this information is solely collected for Track and Trace it is disposed of in 21 days from the date of collection.

In order to do this on occasions we do need to process some of your personal data. When do we do this?

- When we ask for your details for Track and Trace: This is currently a mandatory requirement and if you do not sign in using the 'NHS'Track and Trace App we are obliged to take your name and contact number. These details are taken and will be provided to the Track and Trace team should the unfortunate event occur where there is a Covid-19 case recorded at the premises. The data has to be destroyed in 21 days. If the information given is solely for this it will not be used for anything else such as marketing etc.
- When you visit our website: Our website will use Cookies which are small text files which websites store on the device that you use to access the website. Some cookies do contain personal data. However, in general, we use cookies to run our website and monitor use in order to understand how our customers use them. If you would like more information on our Cookie policy please see below.
- When we wish to verify your age: We operate the Challenge 25 scheme in order to verify age as we are required by law to ensure we do not sell alcohol to anyone under the age of 18. So if you are lucky enough to look under 25 we will ask you for ID, so please don't be offended by this. Photo ID will be requested such as a photo ID driving licence or passport. You can check out the Challenge scheme website to see what other ID can be accepted.
- When you book a table: Booking a table can be done via telephone or in person. When booking we will ask for your name, telephone number and email address in order to confirm the booking. As we are a small pub we do not take online bookings.

We always ask you to tell us about any dietary preferences, food allergies or access needs. We will use this information to make preparations for your visit and look after you whilst you visit our pub. We ask that you tell us if you are celebrating a special occasion. If you are we may ask for your age or date of birth, or about your anniversary or special event, so that we can make your celebration as special as we can.

- When you book a table for a party of 6 or more for food: We will ask you for a non refundable deposit and will ask for your card details which will include the card number, name on the card, start and expiry date and cvc number (verification code). Why do we do this? Dreaded no-shows aren't just inconvenient, they can be fatal, leaving British restaurants and pubs severely out of pocket. In an industry where profit margins can sometimes be quite low, once a few bookings fail to materialise the venue will be looking at a loss for the evening.
- When you use our WiFi: When you first register you may be asked for your name, email address, date of birth, gender, home address and mobile number so that you can be registered for the service. Please check if you have saved your WiFi connection settings to the Mildmay Colours WiFi before you give your device to someone else otherwise they may be able to access some of the personal data used to provide the Wi-Fi service. If you have connected automatically and then change your mind, you can delete the Wi-Fi connection or turn off Wi-Fi on your device.
- When we send you direct marketing: If you have signed up for our newsletters via our website or facebook page we may use your name, telephone number or email address to send you any special offers and other information such as events that we think may interest you. Any newsletter or other marketing will always have details of how to easily unsubscribe and opt out.
- When we collate data for profiling: This is about behavioural patterns, and knowing what our customers like or dislike helps us decide what type of beers, wines and other products to stock. This also helps us accurately target our direct marketing and advertising campaigns. The personal data we use in our profiles includes: Demographic information, such as your age, gender, address and postcode. Purchase information, such as what you bought, how you paid and whether or not you took advantage of a discount. Your likes and dislikes, such as what you drink, what you eat, whether or not you take advantage of special offers and whether or not you like what we post on our websites and our social media pages. Information about family events and special occasions, such as the dates of birthdays, weddings, and anniversaries. Information on whether you use our WiFi service. Of course if you don't want us to use your personal data for profiling any of the above please tell us.
- When you enter any of our competitions or raffles: We will ask you for your name and telephone number in order to process any competition or raffle prize.
- When we record events for promotional purposes: We may use photographs or videos taken of our events for promotional purposes on our website, in Newsletters or on our Facebook page. We will tell you if we are doing this. If you don't want to be photographed or recorded, please let a member of our staff know so that they can ensure your wishes are respected.

- When we record CCTV images: We display a sign that there is CCTV recording on the premises. We use CCTV to help keep our guests and staff safe, so your image may be recorded when you visit us. If an incident occurs, we will review the CCTV images to see if they contain footage that relates to the incident. Such recordings may be used in any criminal/civil or insurance claim-related proceedings that follow.
- When an accident or incident occurs: If there is an accident or incident on our premises and you are unfortunate enough to be involved we will ask for your name, address, phone number, age and any other details that relate to the accident, such as information about any relevant health conditions you have or any injuries or treatments you received.
- When we impose a ban on you visiting our premises: We will not ban a person from our premises unless it is absolutely necessary to do so. If there is serious anti-social, dangerous or criminal behaviour a ban will be imposed. If you are banned we will use your name, photos of you and any other personal data that we need to identify you and which we can use lawfully, to enable our staff to record and enforce the ban and if we are a member of the Pub watch scheme to let other Pubwatch members know about it.
- When you have a query, compliment or a complaint: In order to address any issues or otherwise and to deal with it appropriately we will ask for your name, telephone number and email address so that we can identify you and discuss your enquiry with you.

We will not keep your personal data for any longer than we need it.

We will not sell your personal data.

We might need to share your personal data to uphold your rights, our rights or the rights of other people and we may need to share your personal data to meet some of our legal obligations.

How can you contact us?

If you want to opt out of direct marketing

- Follow the unsubscribe instructions in the last marketing message you received
- Send an email to thecoloursholbeton@gmail.com

**If you want to contact The Colours Holbeton Ltd to discuss how we use your personal data our email address is: thecoloursholbeton@gmail.com
telephone number:**

COOKIE POLICY

What are cookies in computers?

Also known as browser cookies or tracking cookies, cookies are small, often encrypted text files, located in browser directories. They are used by web developers to help users navigate their websites efficiently and perform certain functions. Due to their core role of enhancing/enabling usability or site processes, disabling cookies may prevent users from using certain websites.

Cookies are created when a user's browser loads a particular website. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server. Computer Cookies are created not just by the website the user is browsing but also by other websites that run ads, widgets, or other elements on the page being loaded. These cookies regulate how the ads appear or how the widgets and other elements function on the page.

What are the cookies used for?

We also collect information about you using Cookies. We use Cookies on this website to allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our website.

Most web browsers automatically accept cookies. You do not have to accept Cookies, you can set up your browser to notify you when you receive a cookie. This will give you the opportunity to decide whether to accept it. Refusing Cookies may mean that you cannot access certain features of this website.

Using this website means you agree to our use of cookies. Cookies do not harm your computer system but you can choose to restrict or block them through your browser settings at any time. For more information about how to do this, and about cookies in general, you can visit allaboutcookies.org. Please note that certain cookies may be set as soon as you visit this website, but you can remove them using your browser settings.

Data Analytics

The website uses *Google Analytics* to analyse the usage, performance and activities on our website. This may include recording the pages you visit. If you have a Google account and allowed Google to associate your web and app browsing history so that you may receive personalised ads then Google may collect a Google identifier which allows them to identify you when using this website. Read Google's website for information on how google uses data.

If you wish to opt out of Goggle's Analytics Remarketing and Advertising Reporting Features then please visit Google's personalised ads opt outs. Cookies can also be deleted by users by following the 'clear cookies' action in a browser at any time. The cookies last up to 2 years.

Facebook Pixel

The website uses a Facebook Pixel to analyse the usage, performance and activities on our website for remarketing and advance targeting options on Facebook campaigns. These cookies will last for around 180 days.

