

# Privacy Policy

## PRIVACY STATEMENT

TBC Pub Company understands that customers care about the use and storage of their personal information and data and that you rely upon us to act in a careful and sensible manner in this regard.

This privacy policy statement has been created to demonstrate our commitment to the privacy of our customers. By using TBC Pub Company Hotels, our website, our reservations telephone line and any other TBC Pub Company's service you are consenting and agreeing to the practices outlined in this statement. TBC Pub Company will always handle information in compliance with the Data Protection Act (1998) and the General Data Protection Regulation (GDPR) (EU) 2016/679.

The Internet is a global environment and using the Internet to collect and process personally identifiable information involves the transmission of data on an international basis. By browsing this website and communicating electronically with us you acknowledge and agree to our processing your personally identifiable information in this way.

TBC Pub Company is responsible only for the privacy statement and content of the website. TBC Pub Company is not responsible for the privacy practices or the use of cookies on websites that you have accessed this website from or for the non-TBC Pub Company sites that you access from this website.

Whilst every effort is made to update the information provided on this website on a regular basis, TBC Pub Company makes no representations or warranties, whether express, implied in law or residual, as to the accuracy, completeness or reliability of information contained on any of the pages comprising the website and shall not be bound in any manner by any information contained on the website or any of the pages comprising the website.

TBC Pub Company reserves the right at any time to change or discontinue without notice, any aspect, feature or service offered by way of this website. No opinions, information, data or content contained on the website shall be construed as advice and are offered for information purposes only. TBC Pub Company gives no warranties and makes no

representations as to the accuracy, completeness or reliability of any such opinions, information, data or content.

## **WHEN AND WHY IS PERSONAL INFORMATION COLLECTED?**

### **1. 1. MAKING A RESERVATION**

2. There are several ways of making a restaurant booking with us, including the following:

- By contacting one of our properties directly
- Online at [tbcpubcompany.com](http://tbcpubcompany.com) or our affiliated websites using our secure online booking system

By using our ordering app, or click & collect service on our website (<https://www.zonal.co.uk/privacy-policy/#:~:text=This%20Privacy%20Policy%20governs%20the,any%20mobile%20App%20stores%20in>)

- By emailing [reservations@tbcpubcompany.com](mailto:reservations@tbcpubcompany.com) or one of our properties directly (*Payment details cannot be given by email*)
- Via a third-party booking agent such as Booking.com or Expedia (*Please see their privacy policies for information on how your personal data is collected and used*)

Personal information, including your name, address, contact number, email address, credit card number, expiration date and security code is collected when making a reservation. This information assists with identifying you and contacting you regarding your reservation or any requests.

Your debit or credit card details will be verified and processed using a secure, reliable and fully PCI DSS compliant online payment processing gateway. All data is encrypted to ensure it cannot be read by anybody else. We accept most major credit and debit cards in UK Sterling only. Please note we will never ask you for your payment information via email.

We will use your personal information to send you confirmation of your booking and for any pre- & post arrival communication.

### **2. DURING YOUR STAY**

Upon arrival we will use your personal information stored in our property management system to confirm your booking and identify you. This is the

information collected when making your reservation or if booked via a third party agent such as Booking.com, upon check-in.

We also record your itemised spending during your stay for the purposes of billing. This information is also recorded to comply with financial reporting requirements.

For overseas visitors, we are required by local law to collect your passport number. We will only hold passport information for 12 months as required by law.

### **3. MAKING A RESTAURANT BOOKING**

There are several ways of making a restaurant booking with us, including the following:

- Over the phone with our reservation or reception teams
- By email to our central reservations or reception teams
- Online bookings via a trusted third-party provider, iZone tables

Personal information such as your name, telephone number and email address will be required when making a booking.

### **5. COMPLETING A FEEDBACK QUESTIONNAIRE**

When completing a feedback questionnaire, we may ask you to provide your contact details which will be shared with the relevant General Manager. They may wish to contact you regarding your feedback and experience with us. Questions asked including who you have travelled with and your reason for visiting are for research purposes only and will not be linked to your personal information. *(Please note this is optional)*

### **6. SIGNING UP TO OUR E-NEWSLETTER**

We would like to send you our latest news and offers that may be of interest to you, however you will only receive these types of marketing communication if you have opted in. You can opt into mailing via the following ways:

- Website sign up form
- When making a reservation online or over the phone
- When checking into one of our properties
- When making a restaurant reservation

If you decide that you wish to opt out, you can do so by the following ways:

- Clicking 'Unsubscribe' button included in our emails
- Contact our pubs directly using the 'info@' email address and ask to be removed from the database.

When signing up to our e-newsletter on our website, please indicate your preferences so that we can ensure you only receive information that is useful to you.

When signing up to our e-newsletter, we will store your email address securely on a trusted third-party, Mailchimp. Please see their privacy policy here: <https://mailchimp.com/legal/privacy/>

## **10. CCTV**

CCTV is installed in public areas, entrances and exits of our properties for the prevention and detection of crime. Footage is securely stored and is only accessible to authorised personnel. Footage may be shared with authorities if required by law.

## **HOW IS YOUR PERSONAL INFORMATION STORED?**

When making a reservation, your personal information is stored in our cloud-hosted central reservations property management system as a guest profile. This information is available to our central reservations and TBC Pub Company properties when you are making a booking and allows us to deliver the best possible service to you.

We may also store information securely on with trusted third parties including High Level Software, or iZone Tables

When making a reservation via a third party such as Booking.com, our privacy policy will apply to any personal information shared with us.

## **HOW LONG DO WE STORE YOUR PERSONAL INFORMATION?**

We will only keep your personal information for as long as it is necessary to fulfil our service to you, for business or legal purposes, or in accordance with applicable laws.

## **EMPLOYEE ACCESS TO YOUR INFORMATION**

Your information is disclosed to our employees, agents and representatives on a 'need to know' basis and we confirm that all such

persons understand the importance of client confidentiality and privacy and are aware of the terms of this privacy policy.

### **NON-DISCLOSURE TO THIRD PARTIES**

The information and data we collect is important for The TBC Pub Company and we would not want to share this with anyone else. Unless we have your express consent, we will never disclose, rent, trade or sell your personal data to any third parties for their marketing or mailing purposes.

We do disclose or transfer your data or personal information to other companies, data processors or agents employed by us to perform any necessary functions on our behalf, but they are bound by our privacy policy and may not use this information for their own purposes.

In the event that TBC Pub Company or any part of its business is sold to, or integrated with, another business, TBC Pub Company may disclose your personal information to the new owners (and their professional advisers on the transaction) to be used by the new owners. The access of such specified third parties would be limited to the provision of this privacy policy including continuing to provide you with the same services and marketing information services as are currently provided by TBC Pub Company.

### **WEBSITE – HOSTING**

We use a trusted third party to deliver emails on our behalf, and we may share your personal data with them in order that we can carry out certain functions, such as communicating about an enquiry, processing your order and to assist with the general running of our site. Whilst this party is based outside of the European Economic Area, they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

We may also share your personal data with third party website agencies where this is necessary for us to carry out our obligations to you. 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.

## **RESPONDING TO A DATA BREACH**

In the unlikely event of any of the below data breaches occur, the TBC Pub Company will notify the Information Commissioner's Office (ICO) without undue delay. If there is a risk to individuals affected, they too will be notified.

- Access by an unauthorised third party
- Deliberate or accidental action (or inaction) by a controller or processor
- Sending personal data to an incorrect recipient
- Computing devices containing personal data being lost or stolen
- Alteration of personal data without permission
- Loss of availability of personal data

## **ACCESSING AND AMENDING YOUR DATA**

If you would like a copy of the personal information we hold about you, please email us at [info@tbcpubcompany.com](mailto:info@tbcpubcompany.com) or by writing to us at the following address:

Data Controller  
TBC Pub Company  
27 Baird Road  
Ratho  
EH28 8RU

We do our best to ensure that all information held relating to you is kept up-to-date, accurate and complete. In this regard, we also rely on you to notify us if your information requires updating or deleting. We will respond to requests from you to update or delete your information in an efficient and timely manner.

Should you wish to withdraw your consent to any or all of your personal data in instances where we are required by law to collect this information, you agree and understand that we may not be able to provide or continue providing our products and services.

## **CHANGES TO OUR PRIVACY POLICY**

We regularly review our privacy policy and occasionally make changes so please check back frequently for any updates. This privacy policy was last updated on 23<sup>rd</sup> June 2020

## **LEGAL ISSUES**

This is a United Kingdom website and is subject to the laws of United Kingdom and Scotland. TBC Pub Company will disclose personally identifiable information without your permission when required by law or, in good faith belief, that such action is necessary to investigate or protect against suspected criminal activities to TBC Pub Company guests, visitors, associates or property (including this site) or to others.

TBC Pub Company is the Holding Company of The Bridge Inn at Ratho Ltd (SC368498) and The Ship Inn (Elie) Ltd (SC486348)

Registered Office: TBC Pub Company, Floor 3, 1-4 Atholl Crescent, Edinburgh, EH3 8HA, United Kingdom