

THE PUNCHBOWL AT WOODSTOCK PRIVACY STATEMENT

1. Introduction

- a. This is the Privacy Policy for The Punchbowl, Woodstock.
- b. The Punchbowl, Woodstock respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2. Important Information and who we are

Purpose of this privacy policy

- a. This privacy policy aims to give you information on how the The Punchbowl, Woodstock collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, book through our website, or take part in a competition.
- b. This website is not intended for children and we do not knowingly collect data relating to children.
- c. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

- d. The Punchbowl, Woodstock is the controller and responsible for your personal data (collectively referred to as "The Punchbowl, Woodstock", "we", "us" or "our" in this privacy policy).
- e. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

f. If you have any questions about this privacy policy or our privacy practices, please contact our DPO OR data privacy manager in the following ways:

Full name: The Punchbowl, Woodstock

Email address: tony@punchbowlwoodstock.co.uk. Postal address: The Punchbowl, 12 Oxford Street, Woodstock, OX20 1TR

Telephone number: 01993 811218

g. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

h. Changes to the privacy policy and your duty to inform us of changes

i. We keep our privacy policy under regular review. This version was last updated on July 2022

j. 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.

Third-party links

k. 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 policy of every website you visit.

3. The data we collect about you

Personal data, or personal information, 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 which we have grouped together as follows:

a. Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

b. Contact Data includes billing address, email address and telephone numbers.

c. Financial Data includes bank account and payment card details.

d. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

e. Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

f. Usage Data includes information about how you use our website, products, and services.

g. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

4. If you fail to 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 into with you (for example, to provide you with goods 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.

5. How is your personal data collected?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where we need to perform the contract we are about to enter into or have entered into 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 and where we need to comply with a legal obligation. Examples of how we collect personal data includes:

a. Making a Hotel Reservation, There are several ways of making a hotel or restaurant booking with us, including the following:

i. By calling our venue on 01993 811218

ii. Online at <https://www.punchbowlwoodstock.co.uk>

iii. By emailing info@punchbowlwoodstock.co.uk

iv. 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)

v. 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 all major credit and debit cards in multiple currencies. 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.

b. 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 collection your passport number and next destination. We will only hold passport information for 12 months as required by law.

c. Making a Restaurant Booking, there are several ways of making a restaurant booking with us, including the following:

i. Over the phone 01993 81218

ii. By email to info@punchbowlwoodstock.co.uk

iii. Online bookings via our trusted third-party provider TableAgent

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

d. Completing a Feedback Questionnaire, when completing a feedback questionnaire in our room or answering our past stay email, we may ask you to provide your contact details which will be shared with the Manager. We may wish to contact you regarding your feedback and experience with us.

e. 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:

- i. Website sign up form
- ii. When making a reservation online or over the phone
- iii. When checking into one of our properties
- iv. When making a restaurant reservation via Table Agent or any booking systems we may use
- v. If you decide that you wish to opt out, you can do so by the following ways:
 - 1. Clicking 'Unsubscribe' button included in our emails
 - 2. Contact info@punchbowlwoodstock.co.uk and request to be opted out of future marketing campaigns

vi. When signing up to our e-newsletter, we will store your email address securely on a trusted third-party - Wix

f. 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.

g. Pixel Tags (Web), The Punchbowl, Woodstock and its third-party service providers use pixel tags (also known as 'clear gifs or beacon gifs'). Pixel tags are not visible to the user of the website and consist of a few lines of computer coding delivered with the web page. Pixel tags are not used to collect any personally identifiable information about you apart from what you voluntarily provide us. Pixel tags are used to:

- i. Track customer response to The Punchbowl, Woodstock advertisements and website content
- ii. Determine your ability to receive HTML-based e-mail messages. Our e-mail service provider includes a pixel tag, referred to as a 'coded sensor' in all of the HTML-based messages sent on our behalf. The sensor activates when the e-mail is opened and the flags the e-mail address of the user as one that is capable of receiving HTML-based e-mail messages. This capability helps our service provider to send the e-mail in a format you can read. The sensor does not collect or use any other information. If you cannot receive HTML, you will not receive a functioning sensor.
- iii. Enable us to know how many users open an e-mail and allows our service provider to compile aggregated statistics about an e-mail campaign for us.
- iv. Allow us to target interactive advertising, enhance customer support and site usability and provide offers and promotions which we believe would be of interest to you.

h. Cookies, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use

6. Website – Hosting

a. 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.

b. 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.

c. 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. How is your personal information stored?

a. 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. We may also store information securely on with trusted third parties including Table Agent, Eviivo, Booking.com etc..

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

8. Data security

a. We have put in place appropriate security measures to prevent 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.

b. We have 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.

9. Data retention

a. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax,

accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

b. 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, regulatory, tax, accounting or other requirements.

c. In some circumstances you can ask us to delete your data see below for further information.

d. In some circumstances we will 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.

10. Your legal rights

a. Under certain circumstances, you have rights under data protection laws in relation to your personal data such as:

- i. Requesting access to your personal data
- ii. Requesting correction of your personal data
- iii. Requesting erasure of your personal data
- iv. Objecting to processing of your personal data
- v. Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us.

b. 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.

c. 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.

d. Time limit to respond, we try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month 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.

11. Governing Law and Jurisdiction

This is a United Kingdom website and is subject to the laws of England and Wales and any disputes will be decided only by the courts of England and Wales. The Punchbowl Woodstock 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 The Punchbowl Woodstock guests, visitors, associates or property (including this site) or to others.