

# HOMESLICE PRIVACY POLICY

This privacy policy sets out how Homeslice processes the personal data of its website visitors and customers. It describes how we collect and use the personal data you provide to us, including any personal data you may provide to us when you visit one of our restaurants, use our Wi-Fi services, subscribe to our newsletter or use our website. It also explains how your personal data is shared and protected, what choices you have relating to your personal data and how you can contact us. Homeslice is committed to respecting your privacy and encourages you to read this privacy policy carefully.

## 1 WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

The Homeslice entity responsible for processing your personal data will depend on how you interact with Homeslice's services or products. When you book a table at one of our restaurants the Homeslice entity that owns or operates that restaurant will process your personal data. All other processing of your personal data is done by our parent company, Homeslice Holdings Limited. The relevant Homeslice entity is referred to as "Homeslice", "our", "we" or "us" in this privacy policy.

## 2 WHAT PERSONAL DATA DO WE COLLECT?

Personal data means any information relating to a person who can be identified either directly or indirectly. We will collect and use your personal data when you interact with our website or, as a customer, request our products or services. We will collect the following types of personal data from you: your name, address, email address, phone number and credit/debit card number. For example, when you request to book a table at one of our restaurants we will use your name and contact details to confirm your booking, and when you pay the bill at one of our restaurants we will collect your payment card details to complete the payment.

## 3 PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

We will only process your personal data for the following purposes:

- to process and administer your booking requests;
- obtaining payment from you, if you purchase any of our goods and/or services like our Homeslice t-shirts;
- enabling our suppliers and service providers to carry out certain functions on our behalf, including payment processing, verification, technical, logistical or other functions, as may be required, in order to fulfil your orders or requests;
- resolving any refunds or disputes, if you lawfully exercise your rights or if you wish to dispute any part of our offering;
- sending you our newsletter, where you have agreed that we may do so, in order to keep you informed of our products and services, which we consider may be of interest to you;
- ensuring the security of our business, preventing or detecting fraud or abuses of our website, for example, by requesting verification information in order to confirm your subscription to our newsletter;
- to help us identify you, for example, when you are using our Wi-Fi services;
- developing and improving our products and services, for example, by reviewing visits to our website and its various subpages, demand for specific goods and services; and
- to comply with applicable law, for example, in response to a request from a court or regulatory body, where such request is made in accordance with the law.

## 4 HOW IS YOUR PERSONAL DATA COLLECTED?

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

**Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- sign up to our newsletter;
- login to our Wi-Fi services;
- enter a competition, promotion or survey;
- purchase a Homeslice t-shirt;
- give us some feedback; or
- when you visit one of our restaurants.

**Third party sources.** We may receive personal data about you from various third parties set out below:

- technical data from Google Analytics and Squarespace (for example, data about your use of our website, geographical location, browsing actions and patterns and other data analytics);
- financial and transaction data from providers of technical, payment and delivery services such as Stripe and Paypal (please see their privacy policies <https://stripe.com/gb/privacy> and <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>); and
- other personal data from our WiFi provider Purple (please see their privacy policy <https://purple.ai/privacy-policy/>)

## 5 MARKETING

When you give us your consent, we will send you marketing communications concerning Homeslice's products, services and other promotions (for example, in our newsletter). You can opt out at any time after you have given your consent. If you are an existing customer (for example, if you have placed an order with us) we may use the contact details you provided to send you marketing communications about similar Homeslice products or services where permitted by applicable law (unless you have opted out). You can opt out of receiving our marketing communications by following the unsubscribe instructions included in the marketing communications or by contacting us at [info@homeslicepizza.co.uk](mailto:info@homeslicepizza.co.uk).

## 6 OUR GROUNDS FOR PROCESSING YOUR PERSONAL DATA

To process your personal data lawfully we need to rely on one or more valid legal grounds. If you are a customer, our primary legal ground is that we need your personal data to fulfil our contract with you or to take certain steps prior to entering into our contract with you. However, there may be circumstances where we may also rely on other valid legal grounds for the processing of your personal data, such as:

- your consent to particular processing activities (for example, where you have consented to us using your personal data for marketing purposes);
- our legitimate interests as a business (except where such interests are overridden by your interests and fundamental rights). For example, it is within our legitimate interests to use your personal data to prevent or detect fraud or abuses of our website; or

- our compliance our legal obligations.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to enter into a contract, if we cannot collect this personal data, there is a possibility that we may be unable to provide you with our services and/or to perform all of our obligations under our contract with you.

## **7 DISCLOSURE OF YOUR PERSONAL DATA**

There are circumstances where we wish to disclose or are compelled to disclose your personal data to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure:

- to our subsidiaries, branches or associated offices;
- to our service providers or suppliers to facilitate the provision of our services or goods to you, for example, the disclosure to our data centre provider for the safe keeping of your personal data or webhosting provider through which your personal data may be collected;
- subject to your consent, Mailchimp, who enable us to deliver marketing communication to you. If you do not wish to be contacted, please unsubscribe by emailing us at [info@homeslicepizza.co.uk](mailto:info@homeslicepizza.co.uk) or by clicking the unsubscribe link in the marketing communications;
- to third party service providers and consultants in order to protect the security or integrity of our business, including our databases and systems and for business continuity reasons;
- to another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor company;
- to public authorities where we are required by law to do so; and
- to any other third party we have identified to you and where you have provided consent.

Please note, save as described above we do not rent or trade email lists with other organisations and businesses.

## **8 INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA**

We may transfer your personal data to third parties in countries that do not have same level of data protection as the UK for further processing in accordance with the purposes set out in this policy. In particular, your personal data may be transferred to our outsourced service providers located abroad. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected, for example, by signing the EU Standard Contractual Clauses.

## **9 RETENTION OF YOUR PERSONAL DATA**

Your personal data will be retained until your last use or purchase of our services or goods and normally for a period of two years thereafter, unless longer retention is required by applicable local law or where we have a legitimate and lawful purpose to do so. However, we will not retain beyond this period any of your personal data that is no longer required for the purposes set out in this privacy policy. The retention of your personal data will be subject to periodic review.

We may keep an anonymised form of your personal data, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

## 10 YOUR RIGHTS

Data protection law provides you with numerous rights, including the right to object to our processing of your personal data where permitted by applicable law. You also have the right to request: (i) access to your personal data; (ii) an electronic copy of your personal data (portability); (iii) correction of your personal data if it is incomplete or inaccurate; or (iv) deletion or restriction of your personal data in certain circumstances provided by applicable law. These rights are not absolute. Where we have your consent to process your personal data, you have the right to withdraw your consent at any time. If you would like to request a copy of your personal data or exercise any of your other rights, please contact us at [info@homeslicepizza.co.uk](mailto:info@homeslicepizza.co.uk).

You also have the right to lodge a complaint about how we treat your personal data. In the first instance, if you would like to make a complaint, we suggest that you contact us using the contact details provided below. You can also lodge a complaint with the Information Commissioner's Office (ICO) and you can visit their website [www.ico.org.uk](http://www.ico.org.uk) for more information.

## 11 COOKIES

We may also use cookies. Cookies are small text files that are placed on your computer by the websites you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. You may delete and block all cookies from this website, but if you choose to do so parts of this site may not work.

If you would like further guidance on cookies, please click here <https://www.aboutcookies.org/>.

## 12 CONTACT DETAILS

Legal entity: Homeslice Holdings Limited (registered office address 2nd Floor 32-33 Gosfield Street, Fitzrovia, London W1W 6HL)

Name or title of data privacy manager: Isabella Kershaw

Email address: [info@homeslicepizza.co.uk](mailto:info@homeslicepizza.co.uk)

## 13 UPDATES TO THIS PRIVACY POLICY

We keep our privacy policy under regular review. This version was last updated on 10 May 2019.