

PRIVACY POLICY

Last Updated 24/05/2018

Your information is *your* information and we understand that, which is why we are committed to respecting the privacy of anyone who visits our restaurants and shops (our “**Services**”) or our website (the “**Site**”).

Just to let you know the Site is not intended for children, specifically anyone under the age of 16, so if you are under this age please do not use our Site.

This privacy policy (“**Privacy Policy**”) explains our approach to any personal information we might collect from you (or where a third party has collected it on our behalf) because we want to ensure that you understand this. It also explains what our purpose is when we process this information and your rights surrounding this.

- *This Privacy Policy will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer it and/or provide you with access to it.*
- *This Privacy Policy is intended to help you make informed decisions when using the Site and our Services. Please take a moment to read and understand it. Please note that it should be read in conjunction with our website [Terms and Cookie Policy](#).*
- *Please also note that this Privacy Policy only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties who collect it for their own purposes.*

1 WHO ARE WE AND WHAT DO WE DO?

The Site and our Services are operated by Azzurri Group (“**we**”, “**us**” or “**our**”).

Azzurri Group is the data controller responsible for your personal information.

Azzurri Group is an English company with registered company number: 2792998 and whose registered office is at 3rd Floor Capital House, 25 Chapel Street, London NW1 5DH.

2 HOW TO CONTACT US?

If you have any questions about this Privacy Policy or wish to exercise your rights set out in this Privacy Policy, please contact our friendly Data Privacy Manager by:

- sending an e-mail to privacy@azzurrigroup.co.uk; or
- writing to us at Azzurri Group, 3rd Floor Capital House, 25 Chapel Street, London NW1 5DH.

3 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

We collect and use your personal information in a variety of ways:

We have set out below the ways in which we collect your personal information and the reasons why we use it.

➤ **Fulfilment of Services.**

We collect and maintain personal information that you voluntarily submit to us during your use of the Site and/or our Services. For example, when you request to information from us.

In providing the Services, we may collect the following types of personal information:

- *title, first name and surname*
- *email address*
- *contact telephone number*
- *address or geographic location*

What is our legal basis?

It is in our legitimate interest to use your personal information to provide the services you have requested from us and where it is necessary for the performance of any contract that we have with you.

➤ **Customer services.**

Our Site allows you to request information about our products and Services or make a complaint about any of the Services. Your name and contact information may be requested in each case, together with details of other personal information that is relevant to your customer service enquiry. This information is used in order to enable us to respond to your request or complaint.

What is our legal basis?

It is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best customer service we can to you.

➤ **Business administration and legal compliance.** *We use your personal information for the following business administration and legal compliance purposes:*

- *to comply with our legal obligations;*
- *to enforce our legal rights;*
- *protect rights of third parties; and*
- *in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.*

What is our legal basis?

Where we use your personal information in connection with a business transition, enforce our legal rights, or to protect the rights of third parties it is in our legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us such as a court order.

Where we share your sensitive personal information, we shall obtain your consent to do so.

➤ **Recruitment.**

We use your personal information (e.g. name, job title, contact information including email address, curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us and any other information relevant to potential recruitment) for the following recruitment purposes:

- *To assess your suitability for any position for which you may apply to us whether such application has been received by us online, via email or by hard copy or in person application or through a third party recruitment agency.*
- *To review our equal opportunity profile in accordance with applicable legislation, and we do not discriminate on the grounds of gender, race, ethnic origin, age,*

religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit.

What is our legal basis?

Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for Azzurri Group. We will not process any special data except where we are able to do so under applicable legislation or with your explicit consent which shall be obtained at the time we collect your personal information following the instructions provided.

- Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details.

4 HOW DO WE SHARE YOUR PERSONAL INFORMATION?

We do not sell any of your personal information to any third parties. Your privacy is important to us. However, we will share your personal information with a variety of companies, where it is necessary to do so, in order to enable us to provide the services to you as set out in this Privacy Policy.

We may share your personal information with the following types of companies:

Reason	Categories of companies
<u>Customer services</u> (e.g. if you send us a query or make a complaint).	Customer queries are dealt with by an internal team.
<u>Business administration and legal compliance</u> (e.g. the boring, but important stuff such as complying with any legal obligations we may have)	Professional advisers such as lawyers, accountants and government or regulatory authorities.
<u>Recruitment</u> (e.g. to hire great people to join our team)	External recruiters

5 INTERNATIONAL TRANSFERS

Where necessary in order to deliver our services, we will transfer personal information to countries outside the EEA. When doing so, we will comply with our legal and regulatory obligations in relation to

the personal information including having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

6 HOW DO WE OBTAIN YOUR CONSENT?

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Policy.

7 OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES

Our Site uses certain cookies, pixels, beacons, log files and other technologies of which you should be aware. **Please see our [Cookie Policy](#)** to find out more about the cookies we use and how to manage and delete cookies.

8 THIRD PARTY LINKS AND SERVICES

Our Site contains links to third party websites and services. Please remember that when you use a link to go from our Site to another website or you request a service from a third party, this Privacy Policy no longer applies.

Your browsing and interaction on any other websites, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies.

We do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

This Privacy Policy applies solely to personal information collected by us through our Service and does not apply to these third party websites and third party service providers.

9 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

Regarding personal information we have processed in connection with the supply of our products and services to any customer, we will retain personal information relevant to that supply of products or services for six years from the date of supply and in compliance with our obligations under the EU

General Data Protection Regulation (or similar legislation around the world). We may then destroy such files without further notice or liability.

Regarding any other personal information we have processed, we will retain relevant personal information for a period of five years from the date of our last interaction with you.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal information indefinitely so we do not send you marketing communications again.

If your information is only useful for a short period e.g. for specific marketing campaigns we may delete it at the end of that period.

10 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- *unauthorised access;*
- *improper use or disclosure;*
- *unauthorised modification; and*
- *unlawful destruction or accidental loss.*

All of our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our Services.

11 HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?

You have the following rights in relation to the personal information we hold about you:

➤ **Your right of access.**

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

➤ **Your right to rectification.**

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to erasure.**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to restrict processing.**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll

let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to data portability.**

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

➤ **Your right to object.**

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing;
- processing your personal information for personalised direct marketing; or
- processing your personal information for non-personalised direct marketing.

➤ **Your rights in relation to automated decision-making and profiling.**

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

➤ **Your right to withdraw consent.**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

➤ **Your right to lodge a complaint with the supervisory authority.**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

12 CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time. s

To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.