



The Crown Inn Privacy Policy

Contents

1. Important information and who we are.....	1
2. The data we collect about you	3
3. How is your personal data collected?	5
4. How we use your personal data.....	6
5. Disclosures of your personal data.....	11
6. International transfers.....	11
7. Data security	12
8. Data retention.....	12
19. Your legal rights.....	13
10. Glossary	13



Introduction

Welcome to the privacy notice for The Crown Inn. This privacy notice covers communications between you and The Crown Inn (Elton) Limited (**The Crown Inn**). This may be via the website (www.crowninnelton.co.uk) or in direct communications.

The Crown Inn respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), or otherwise provide personal data to The Crown Inn. It will also tell you about your privacy rights and how the law protects you.

This privacy notice is divided into sections so you can move to the specific sections detailed above in the contents table. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

The Crown Inn (Elton) Limited is registered in England and Wales; registration number 06740873. Registered office address: 11 Glasshouse Street, St Peters, Newcastle upon Tyne, NE1 6BS.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how The Crown Inn collects and processes your personal data either (a) through your use of our website, including any data you may provide through our websites when you sign up to our newsletter, purchase a product or service; or (b) via any other communication with The Crown Inn such as letter, email, telephone call or providing us with your details via social media.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notice supplements the other notices and is not intended to override them. Additional notices may also be provided, including in terms and conditions, when we launch promotions or competitions and such notices and terms and conditions will state how your personal data is used, if it will differ from the uses outlined in this privacy notice.



Controller

The Crown Inn is a legal entity and part of the British Engines Group of companies. This privacy notice is issued on behalf of The Crown Inn so when we mention, "we", "us" or "our" in this privacy notice, we are referring to The Crown Inn.

For the purpose of managing our relationship with you we may share personal data with other legal entities under common ownership with The Crown Inn. This is necessary for our legitimate interests of keeping our records up to date and may be necessary to ensure that we can comply with legal obligations. For example British Engines (UK) Limited performs services, particularly marketing services, on behalf of The Crown Inn and to perform these services, financial support services, legal and HR support your personal data may be shared with British Engines (UK) Limited.

The Crown Inn has a Compliance Officer (CO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the CO using the contact details below.

Contact details

Name or title of CO: Compliance Officer and Legal Counsel

Email address: compliance@britishengines.com

Postal address: 11 Glasshouse Street, St Peters, Newcastle upon Tyne, NE1 6BS

Telephone: 0191 2043819

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.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in May 2018; hard copies can be obtained by contacting us at compliance@britishengines.com.

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

Websites operated by The Crown Inn 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 websites operated by The Crown Inn, we encourage you to read the privacy notice of every website you visit.

Children's Personal Data

The Crown Inn's website and communications are not intended for under 16 year olds.

2. 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:

- **Identity Data** includes first name, surname, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties.



We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **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 notice.

The type of data which we collect from you will be determined by the nature of your relationship with The Crown Inn.

3. Information collected when you are seeking employment with The Crown Inn.

If you are seeking employment with The Crown Inn, we may ask you to share **Special Categories of Personal Data** with us or a third party. This could include information about your health to ensure that you would be able to perform the role applied for.

If you do enter into a contract of employment with The Crown Inn, your personal data will be protected in accordance with the The Crown Inn Employee Privacy Policy. In addition to the above you should be aware that we would only process health and medical data where it is in our legitimate interests to process such data:

- a) to ensure we fulfil our statutory or contractual obligations to you (e.g. in providing you with a safe working environment);
- b) to ensure that you are physically and mentally fit to do your job; and
- c) if you have a disability to allow us to make reasonable adjustments for you,

in any event, we would only obtain medical information from our occupational health team once you had consented to such information being disclosed to us.

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. This could mean that we would be unable to engage you as an employee as specified above, or continue with a booking if you fail to provide personal data necessary for us to secure that booking. 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 use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and details of qualifications by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - give a business card to an employee of The Crown Inn;
 - provide information at an exhibition or marketing event;
 - book a table or bedroom;
 - seek further information through our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - apply for or enquire about a job or work placement; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We can collect data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. In accordance with our cookie policy we only collect personal data through cookies with your consent. Please see our cookie policy http://www.crowninnelton.co.uk/pdf/the_crown_inn_cookie_policy.pdf for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU; and
 - (b) search information providers.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as World Pay Merchant Services; The Rocket Science Group LLC d/b/a MailChimp based outside the EU; Campaign Monitor Pty Ltd based inside and outside of the EU; eviivo Limited who process bookings for The Crown Inn (inside the EU) and online travel agents such as Expedia.
 - Identity and Contact Data from data brokers or aggregators



- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Where your data is processed by a third party on behalf of The Crown Inn, agreements will be put in place to govern the processing. Where any processing is carried out outside of the EEA, the processing agreement will incorporate and address the safeguards required by the law.

6. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 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.
- Where we need to comply with a legal or regulatory obligation.

Generally we only rely on consent as a legal basis for processing your personal data when sending direct marketing communications to you via email.

Relying on your consent ensures that we also comply with our obligations under the Privacy and Electronic Communications Regulations (PECR).

You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our CO, using the details above, if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a contract with you
To process and deliver your services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • In the context of a contract with you, necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) • Outside of a contractual relationship, consent.
To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Consent
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services,



and hosting of data)		<p>network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <ul style="list-style-type: none"> • Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) • Consent
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) • Consent
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	<ul style="list-style-type: none"> • Consent
To assess suitability for employment or work placements	<ul style="list-style-type: none"> • Identity • Contact • Special category data 	<ul style="list-style-type: none"> • Consent



To provide you with information requested on employment, training and work placement opportunities	<ul style="list-style-type: none">• Identity• Contact	<ul style="list-style-type: none">• Consent
--	--	---



Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you (a) asked for a quotation; (b) made an enquiry; (c) provided details at a trade show or event and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by unsubscribing using the link on every communication.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase. Any queries should be directed to compliance@britishengines.com.

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, please see http://www.crowninnelton.co.uk/pdf/the_crown_inn_cookie_policy.pdf

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



7. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 7 above.

- Internal Third Parties, being other group companies.
- External Third Parties as set out in Section 12 *Glossary* below.
- Specific third parties listed in Section 3 b above.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

8. International transfers

Many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.



Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. Data security

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.

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.

10. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we have to keep basic information about our transactions for tax purposes for six years, this may include information on customers (including Contact, Identity, Financial and Transaction Data).

We will keep personal data (Contact, Identity, Profile and any Special Category Data) provided in relation to unsuccessful job applications for 12 months from the date the candidate is determined unsuccessful. If a candidate becomes an employee we will store personal data in accordance with The Crown Inn Employee Privacy Policy and its associated procedures.

We will keep Contact and Identity information obtained solely for the purpose of marketing for 24 months from the date of consent to hold such data. If, after 24 months, you have not unsubscribed we will either delete your data or seek to refresh the consent, in accordance with the applicable law at that time.

In some circumstances you can ask us to delete your data: see *Request erasure* in the Glossary below for further information.



In some circumstances we may 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.

11. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are summarised in Section 12 *Glossary* below, but additional information can be found using the link below.

<https://ico.org.uk>

If you wish to exercise any of your rights set out above, please contact us at compliance@britishengines.com.

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.

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may 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.

12. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your



personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

British Engines (UK) Limited, acting as joint controller, which is based in the EU and provides IT, HR, marketing, legal and system administration services and receives leadership reporting.

External Third Parties

- Service providers acting as processors based both inside and outside of the EU who provide IT and system administration services; payroll services; marketing services, business support services as detailed in section 3 above.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the EU who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.



Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.