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Privacy Policy

We are committed to ensuring your privacy is protected. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this Privacy Policy carefully. When using our website, this Privacy Policy should be read alongside the website terms and conditions.

1. About Us

This Privacy Policy describes how The Big Table Group, trading as Café Rouge ("we" or "us" or "our") collect and process data about individuals.

For the purpose of the General Data Protection Regulation (2016/679) and the Data Protection Act 2018 (the "Legislation"), the data controller is Proclivity Ltd., a company registered with number 13927221. The registered address is 296 Den Lane, Springhead, Oldham OL4 4SG.

Our Data Protection Officer can be contacted by emailing dpo@proclivity.uk, as further detailed below

2. What information we collect and when

We only collect information that we know we will genuinely use and in accordance with the EU General Data Protection Regulation (GDPR), the Data Protection Act 2018 and associated data protection legislation. We may collect.

Information you give us

This information about you that you give us by filling in forms on our website www.proclivity.uk (our "Site") or by corresponding with us by phone, e-mail, in our restaurants or otherwise. It includes information you provide when you register to use our Site, subscribe to our newsletter, register to use our App, book a table at one of our restaurants, enter a competition, promotion or survey, purchase a gift card or voucher, apply for a job with us, register for Wi-Fi in our restaurants and when you report a problem with our website. The information you give us may include your name, address, e-mail address postcode, phone number and birthday.

Information we collect about you on our site:

With regard to each of your visits to our Site we may automatically collect the following information:



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- Information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, date and time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number

Information we collect when you make a booking:

We use approved third parties to operate our reservations platform. They will send you an automated email message to confirm your booking details and may send further service emails if there is a change to your booking. We are also partnered with a third party companies who will send a service email giving you the opportunity to review your dining experience, so that we can make any necessary improvements.

Information we collect when you use wifi in our restaurants

If you sign up to use the wifi in our restaurants, the third party operator terms and conditions will apply.

Information we receive from other services

This information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combined your data. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

Photography and Video recordings

As part of our local and brand marketing activities, from time to time we may be filming or taking photographs of happy guests enjoying their visits to our restaurants, when filming or taking photos for a particular campaign, the site will display a prominent poster to confirm that filming and photos will be taken in the restaurant. We will ensure that consent is obtained expressly in every case.

3. Cookies



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Similar to other commercial websites, our Site uses a technology called "cookies" and web server logs to collect information about how our Site is used. A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that Site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies.

Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our Site, and the Sites visited just before and just after our Site. Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our Site and which parts of the Site are most popular. This helps us gather feedback so that we can improve our Site and better serve our customers. Cookies do not allow us to gather any personal Information about you and we do not generally store any personal Information that you provided to us in your cookies.

We use 'session' cookies which enable you to carry information across pages of the Site and avoid having to re-enter information. Session cookies enable us to compile statistics that help us to understand how the Site is being used and to improve its structure. We also use 'persistent' cookies which remain in the cookies file of your browser for longer and help us to recognise you as a unique visitor to the Site, tailoring the content of certain areas of the Site to offer you content that match your preferred interests.

You can refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Site

4. Purposes for which we will use your personal Data.

We will only process your personal data in line with that which is permitted by the Legislation. 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 us if you need details about the specific legal ground we are relying on to process your personal data. Typically we will process your data on one of the following bases:

- Consent given (e.g. for obtaining feedback, photos and video recordings for marketing purpose)
- Performance of a contract or an agreement with you (e.g. entry in a competition.)
- Necessary for our legitimate interests (e.g use of CCTV on sites)
- Necessary to comply with a legal obligation (e.g. if requested by authority for investigation)



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5. How we use your information

We use information held about you in the following ways:

- To provide you with the information, products and services that you request from us;
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- To provide you with information about goods or services we feel may interest you, where you have consented to us contacting you for the purposes of marketing or other promotional purposes. If you are an existing customer, we will only contact you or share information with you by electronic means (e-mail, social media or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you do not want us to use your data in this way, please tick the relevant box situated on the form on which we collect your data;
- To validate discounts and verify your identify;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and others;
- To notify you about changes to our service
- To ensure that content from our site is presented in the most effective manner for you and for your computer;

Photography and recordings

- Use on social media and in our marketing. We will ensure that consent is obtained expressly

Information we collect about you. We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and others;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).



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6. Who we may share your information with:

Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

Selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them. Our site may, from time to time, contain links to and from the Sites of our partner networks, advertisers and affiliates. If you follow a link to any of these Sites, please note that these Sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these Sites.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may be required to disclose your personal data to the prospective seller or buyer of such business or assets.
- If Proclivity Ltd or its direct or indirect parent companies, or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies, organisations and law enforcement agencies for the purposes of fraud protection, prevention or detection and credit risk reduction

7. Keeping your data secure

Data security is of great importance to us and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we believe are entitled to be there (by use of passes, key card access and other related technologies)
- Implementing access controls to our information technology;



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- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices and stores
- Carrying out appropriate risk-based diligence and penetration testing on third party processors;

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. **Sending INFORMATION OUTSIDE THE UK**

Where any transfer outside of the UK occurs, we'll ensure that any such transfer or processing is subject to appropriate legal and technical safeguards.

9. **How LONG WE WILL STORE YOUR DATA**

We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the General Data Protection Regulation (GDPR) and never retain your information for longer than is necessary. For more information, you may contact our DPO.

We will only retain your Information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept.

10. **Your Rights**

Under the Legislation you have the right to make certain requests in relation to the personal information that we hold about you. We will not usually make a charge for dealing with these requests. If you wish to exercise these rights at any time please contact us using the details set out in the "Contact " section

You have the right to be informed about the collection and use of your personal data.

- The right of access: You have the right to access the personal information that we hold about you in many circumstances. This is sometimes called a 'Subject Access Request'. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so;



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- The right to rectification: If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.
- The right to object: You have the right to ask us not to process your personal data for marketing purposes, in particular where we have used consent as the lawful basis for processing. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by emailing dpo@proclivity.uk.
- The right to erasure: 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, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the law. Note, however, that we may not always be able to comply with your erasure request for specific legal reasons. Right to erasure does not apply in the following scenarios (i) when the lawful basis for processing the data is 'legal obligation'; (ii) For the establishment, exercise or defence of legal claims'.
- The right to restrict processing: This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if our use of the data is unlawful but you do not want us to erase it, (ii) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it, or (iii) 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.
- 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 may only apply to automated information which you initially provided consent for Proclivity Ltd to use or where Proclivity Ltd used the information to perform a contract with you;
- Withdraw consent at any time where the Proclivity Ltd. is relying on consent to process your personal data for direct marketing purposes: However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. All marketing communications will contain information about how to opt-out and electronic communications will have a direct link to unsubscribe. 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. Where possible we will endeavour to respond to notifications of withdrawn consent for use of image or film prior to publishing the image or film. It may not be possible to do so after publication.

You have a right to complain to the Information Commissioner's Office if you believe that any use of your personal information by us is in breach of applicable data protection laws and/ or regulations. More information can be found on the Information Commissioner's Office website <https://ico.org.uk>.



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11. Children

Our websites are not designed to target children under the age of 16. In compliance with the Children's Online Privacy Protection Act, we require all children under age thirteen (13) to obtain parental consent to join any of our lists. By accepting this privacy policy you are confirming that you are over 13 years old. All terms of our privacy policy apply to children under 13.

12. What HAPPENS IF OUR BUSNIESS CHANGES HANDS?

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the purposes for which it was originally collected by us.

13. Changes to our Privacy Policy

We will make changes to this privacy policy from time to time. Any updates to the privacy policy in the future will be posted on this page. Please check back to see any updates or changes to our privacy policy.

14. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to dpo@proclivity.uk or by post to 26 Market Street, Shaw, OL2 8NJ.

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they can help you address any concerns.