

## **Ahi Poké Privacy Policy**

**17 May 2018**

### **1. INTRODUCTION**

**1.1 Welcome to the privacy notice of Double Seven Hospitality (“Ahi Poké”).**

**1.2 Ahi Poké 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) and tell you about your privacy rights and how the law protects you.**

**1.3 This website is not intended for children and we do not knowingly collect data relating to children.**

### **2. WHO ARE WE?**

**2.1 This website (the "Website") is owned and operated by Double Seven Hospitality, a company registered in England and Wales under registration number 9999588 our registered office is at 3 Percy Street, W1K 6ZP, LONDON, UK. Ahi Poké is part of the BVC Group which is made up of different legal entities, details of which can be found here [[www.bvcgroup.co.uk](http://www.bvcgroup.co.uk)]. This privacy notice is issued on behalf of Ahi Poké and all companies in its Group so when we mention “Ahi Poké“, "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Group responsible for processing your data. Double Seven Hospitality is the data controller and responsible for this website.**

### **3. WHAT IS THIS PRIVACY POLICY FOR?**

**3.1 Purpose. This privacy notice aims to give you information on how Ahi Poké collects and processes your personal data through your use of this website.**

**3.2 Please read this Privacy Policy. You should read this carefully to understand our views and practices regarding your personal data and how we will treat it. 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..**

**3.3 What it covers and what it does not cover. This Privacy Policy gives information about:**

- (a) why we collect and use personal data;**
  - (b) what personal data we collect;**
  - (c) the choices we offer, including how to access and update your personal data;**
- and**
- (d) our use of cookies and how you may disable such cookies.**

**It does not apply however to the practices of third party websites, third party apps or any or third party companies. 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 notice of every website you visit. You will be subject to the terms and conditions of use and privacy policies of those other websites and apps or companies when you are using them.**

**3.4 Updates.** We may change and update this Privacy Policy from time to time and we show the effective date of the currently applicable Privacy Policy at the beginning of it. Any updates to our Privacy Policy can be found on our Website and App and, where appropriate, you may be notified by e-mail. We recommend that you revisit this page regularly to keep up to date and to make sure that you are happy with changes. Updates and changes are legally binding upon you as soon as we post them (superseding any prior policy that may apply) whether or not we provide you any other notice of such changes.

#### **4. WHAT PERSONAL DATA DO WE COLLECT?**

**4.1** We can only provide Benefits to you or fulfill subscriptions if we collect personal data. By personal data we mean personally identifiable information such as your name and contact details.

**4.2** 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).

**4.3** We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, email address and telephone number.
- Financial Data includes bank account and payment card details.
- 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.
- 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 and your communication preferences.

**4.4** 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.

**4.5** 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.

#### **5. HOW IS YOUR PERSONAL DATA COLLECTED?**

**5.1** We use different methods to collect data from and about you including through:

**5.1.1** Information you give us. This is information about you that you give us by filling in forms on our Website (our site) or by corresponding with us by phone, e-mail

or otherwise. It includes information you provide when you contact us by email to book a table or apply for a job, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information.

**5.2 Information we collect about you.** With regard to each of your visits to our site or we will automatically collect the following information:

**5.2.1** technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, [email client, location;

**5.2.2** information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), information 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, crashes and any phone number used to call our customer service number.

**5.3** We use certain third parties to help us with our Website and other administration activities relating to our business. Some of these parties are based in the European Economic Area and some are based outside the European Economic Area. You agree that we may transfer your personal data to those third parties for the purposes of our business. Countries outside the European Economic Area may not offer the same level of data protection as the United Kingdom. However, our collection, storage, and use of your personal data will continue to be governed by this Privacy Policy.

## **6. WHAT DO WE DO WITH YOUR INFORMATION?**

**6.1** We will only use your personal data when the law allows us to. Most commonly, we will use this information to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us; to notify you about changes to our service; and to ensure that content from our site 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.

**6.2** We will also use your personal data 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 or where we need to comply with a legal or regulatory obligation.

## **7. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

**7.1** 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. We have also identified what our legitimate interests are where appropriate.

**7.2** 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 us 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
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To register you as a new customer	(a) Identity (b) Contact
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications
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	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage

**7.3 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.**

**7.4 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.**

**7.5 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**

## **8. INFORMATION SECURITY**

**8.1 We are committed to ensuring that any personal data you give to us is kept secure. In order to minimise the risk that there is unauthorised access to or disclosure of your personal data, we put in place, where practicable, appropriate physical, electronic and managerial procedures to safeguard and secure it.**

Although we take appropriate measures to safeguard the personal data that you provide to us, no transmission over the Internet is guaranteed to be secure. Where we have given you (or where you have chosen) a password you are responsible for keeping this password confidential. You should not share your password with anyone.

## **9. DISCLOSURE OF YOUR INFORMATION**

**9.1 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.**

**9.1.1 Internal Third Parties: Other companies in the Group acting as joint controllers or processors and who are based in the UK and provide accounting and administration services.**

**9.1.2 External Third Parties: Other companies outside the Group acting as data processors such as IT system providers, OPENTABLE, advisers (such as lawyers and insurers), ;**

**9.1.3 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.**

**9.2 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.**

**9.3 We do not transfer your personal data outside the European Economic Area (EEA) but some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the EEA. In these circumstances, we would only permit your personal data to be transferred outside the EEA to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or in the case of US 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.**

## **10. HOW WE USE COOKIES**

**our Website and App uses cookies.**

- **10.1 What are cookies. A cookie is a small data file placed on your computer's hard drive or other mobile or handheld device as you browse our Website or advertisements, videos or other types of content and which 'remembers' that your computer or device accesses the Website. The file is added to your computer's hard drive or other mobile or handheld device. Most web browsers automatically accept cookies but you may modify your browser settings to decline cookies or to be notified of cookies being placed. The cookies do not give us access to any other personal data on your computer or device other than the personal data you choose to share with us.**

**10.2 Why do we use cookies. Cookies may be used by us to do the following:**

- **(a) enable us to respond to you as an individual and to tailor our operations to your needs by gathering and remembering personal data about your preferences;**

- (b) assist the effective operation of our Website,
- (c) to re-target advertisements or other content on our Website so that they are displayed when you use third party websites;
- (d) enable traffic to our Website and pages to be logged to identify pages used and browsing and purchasing behaviour of users of our Website for statistical purposes and to monitor which pages users find useful or not; or
- (e) identify you as an account holder or user and assist with account or user security (such as by obliging you to re-set passwords if the password has lapsed).

10.3 What to do if you do not want us to use cookies. Rejecting cookies may prevent you from taking full advantage of our Website may stop our Website from operating properly when you use it. You may be unable to complete a transaction with us on our Website. If you do not consent to use of the cookies, you must disable the cookies by deleting them or amending your cookie settings on your computer or you must stop using the Website.

10.4 Your choice to consent. You have the choice to restrict our collection or use of your personal data in the following ways:

- (a) when you are asked by us to accept a cookie or to fill in a form on our Website , look for your cookie settings and the area that you can click to indicate your preference as to use of your personal data for marketing or other purposes; and
- (b) if you have previously agreed to accept a cookie, then you may change your mind at any time disabling or deleting the cookie or amending your cookie settings.

## 11. HOW LONG WILL YOU USE MY DATA?

11.1 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.

11.2 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.

11.3 By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and legal purposes.

## 12. YOUR RIGHTS

You have the right to:

12.1 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.

12.2 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.

12.3 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.

**12.4 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.**

**12.5 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.**

**12.6 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.**

**12.7 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**

### **13. HOW TO CONTACT US**

**Queries.** If you wish to update any personal data that we have processed on you or have any queries relating to the personal data we process or this Privacy Policy, you may contact us at: [hello@ahipoke.co.uk](mailto:hello@ahipoke.co.uk)