

PRIVACY POLICY

FOR SELECT PROPERTY GROUP LEISURE HOLDINGS

We take privacy seriously and we are committed to protecting it.

This policy explains when and why we and companies in our Group (which here means our subsidiaries, our ultimate holding company and its subsidiaries from time to time, as defined in section 1159 of the UK Companies Act 2006, and may also include other companies which are associated through our management control but may not be a group company) collect personal information about individuals who are customers, prospective future customers, previous customers and other individuals who may be connected to them, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

This policy may change from time to time so please check this page occasionally to ensure that you're aware of and happy with any changes.

This policy was last updated on the 24th of May 2018

WHO WE ARE

Select Property Group Leisure Holdings Limited (company registered number 10133864) trades under the restaurant brand 'School For Scandal', (amongst other names), which is the name referred to throughout the rest of this document. This company is the data controller in relation to the processing activities described below. This means that we decide why and how your personal information is processed.

This policy also covers certain other Group companies which are listed at Schedule 1 to this policy. Whenever dealing with one of these other Group companies, we will be the 'controller' of your personal information

A "data controller" is an organisation that decides why and how your personal information is processed.

Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to the particular company that is the controller of your personal information.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information from you in the following ways:

Personal information you give to us:

This is information about you that you give to us by, for example:

- Visiting our Websites (www.schoolforscandal.com);
- Using any Web or mobile applications (including online chat);
- Viewing or following our channels on any social media platforms;
- Corresponding with us by phone, email or otherwise;
- Attending one of our restaurant premises or special events;
- Making a restaurant reservation in person, by phone, or via one of our appointed agents

and is provided by you voluntarily. This includes information provided at the time of registering to use our site, expressing an interest in making a booking, making a booking, subscribing to the services we provide through our websites and other channels, following one of our social media counts, requesting further information, material or associated services, managing your personal details (including accessing documentation and engaging in correspondence with us by phone, email or otherwise). If you complete any surveys that we request you complete for research purposes or enter any free prize draw, we will collect information in such circumstances as well. The information you give us will typically include your name, address, email address and phone number(s), and may include records of any correspondence and responses to marketing campaigns.

Personal information we collect about you:

We may collect the following information, either by request or automatically: your contact details, geographic and demographic information, preferences and interests and other information you provide through, amongst other things, responses given in surveys, and visits to our Websites, including, data about the information and resources you access. We may also automatically collect technical information, including anonymous data collected by the hosting server, the Internet Protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Please see our [Cookies Policy](#) for further information. We may also collect any personal information which you allow to be shared that is part of your public profile(s) on third party social networks, including but not limited to time zone setting, browser plug-in types and versions, operating system and platform, and your preferences, interests and other behaviours. .

Personal information we may receive from other sources:

We may also obtain certain personal information about you from sources outside of our business which may include both our Group companies (where you have previously provided details to them) or other third party companies where you have previously provided your consent to personal information being shared, in accordance with those third parties' own privacy policies. The personal information we receive from third party sources is typically your contact details, certain demographic information, and may also include details about information you have previously requested and/or preferences you have previously expressed concerning specific areas of interest.

TYPE OF PERSONAL INFORMATION WE PROCESS ABOUT YOU

We may process a range of personal information about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the list below and provided a short explanation of the type of information each category typically covers.

Behavioural	Such as your activities, actions and behaviours
Biographical	Such as your place of work and job title, which can be used to address, send or otherwise communicate a message to you
Geo-location	information which contains or reveals the location of your electronic devices
Identification	information contained in a formal identification document such as your passport
Fraud	information relating to the occurrence, investigation or prevention of fraud
Legal	information relating to legal claims made by you or against you or the claims process
Booking transactions	information relating to restaurant bookings and ancillary services provided to you and
Correspondence	information contained in our correspondence or other communications with you about our products, services or business

HOW WE USE YOUR PERSONAL INFORMATION

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

Where there is a Legal Requirement

We will use your personal information to comply with our legal obligations, such as: (i) to assist any public authority, industry regulator or criminal investigation body; (ii) to correctly identify you when you contact us and/or to verify the accuracy of data we hold about you.

Where it is required to complete or comply with terms and conditions

We may use and process your personal information where we have sold you a product or products, supplied you (or continue to supply you) with any services, where we have arranged for the supply of another party's products or services to you as their appointed agent, or where you are in detailed discussions with us about the sale or purchase of a product or service. We will use this information in connection with ensuring that the terms of the relevant contract(s) are carried out or entered into. This may include circumstances in which we are not a party to the contract ourselves, however we have been appointed to administer or provide services relating to that contract. For the purpose of this description, a 'contract' will typically mean a sale and purchase agreement, lease or management services agreement. Please refer to 'Type of personal information we process' about you above for details of the types of personal information we process for these purposes.

Where we have assessed there is a Legitimate Interest

We may use and process your personal information where we have deemed it is necessary for us to pursue either our legitimate interests as a business, your legitimate interests as a customer or prospective customer, or the Legitimate Interests of a Group company, for the following purposes:

- to correspond or communicate with you generally, for example with company or other relevant news;
- for marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services or share your details with third parties to do the same, as explained below);
- for analysis to inform our future marketing strategy, and/or to enhance or personalise your customer experience (such as improving the quality or relevance of information we provide to you in future);
- to verify the accuracy of data that we hold about you and create a better understanding of you as a customer or potential customer;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for prevention of fraud and other criminal activities;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- to review facts, assess and improve our service to customers through recordings of any calls with our offices;
- for the management of any queries, complaints, or claims you bring; and

for the establishment and defence of our legal rights.

Where you have provided Consent

We may use and process your personal information on the basis that you have consented for us to do so, for the following purposes:

- To contact you via email or SMS with marketing information about our goods and services, predominantly being restaurant and casual dining services.
- To share your data with certain Group companies in order for them to contact you with marketing information about similar products and services.
- We will never share or sell your data with unconnected third parties for commercial gain without your knowledge and consent.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Withdrawing your consent](#) for further details.

OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION

Group companies

We may share your information with other Group companies. They may use your personal information in the ways set out in the section [How we use your personal information above](#), in connection with the certain specific ancillary or complementary products and/or services, for example products and services which only they can provide for regulatory reasons, or products and services which are similar to those We offer but may be under the name of a different brand. Some of our Group companies may also be service providers to us, as explained in the section below.

Please see the start of this policy for a description of what we mean by Group companies with whom we may share your personal information in this way.

Our suppliers and service providers

We may disclose your information to certain selected third-party service providers, agents, subcontractors and other organisations where necessary for the purposes of them providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting and software service providers), online reservation agents or order-taking intermediaries, digital and marketing agencies and administrative services providers.

When we use third party service providers in this way, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions for the purposes intended and set out in this Policy.

Credit/debit card payment processors

When you purchase certain products or services via our websites, over the phone or at one of our premises, a credit or debit card payment may be processed with your instruction by a third party payment processing agent who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please ask us at the time of making the payment or contact us using the details at the end of this policy.

We do not store or keep a record of your credit card details on our own websites or within our own systems.

Other ways we may share your personal information

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, for example to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of other data subjects. If/when we do so, we will always take steps with the aim of ensuring that your privacy rights continue to be protected and your rights are upheld.

WHERE WE STORE YOUR PERSONAL INFORMATION

Information you provide to us may be transferred to countries outside the EEA, for example where any of our Group companies which need access to that information are incorporated in a country outside of the EEA, or if any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. This is because some countries outside the EEA do not have the same adequate data protection laws equivalent to those within the EEA. These steps may include, for example imposing contractual obligations on the recipient of your personal information or ensuring that the recipients subscribe to other relevant regulatory regimes or best practice that aim to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place in these circumstances.

If you use our services, access our systems or view any of our content whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

When we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than we consider necessary.

The length of time we retain your personal data may also vary depending on the legal basis we are using.

Where your personal data is required to complete or comply with Terms and Conditions

We may need your personal information to comply with our own legal and accounting responsibilities, and/or to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed under [How we use your personal information](#) above. Where we are only required to retain some of your information for these purposes, we will use our reasonable endeavours to 'minimise' that data and not to retain any information which we do not need to hold for 7 years.

The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or to delete it sooner;
- you exercise your right to have the information erased (where applicable) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Erasing your personal information or restricting its processing](#) below); or
- in limited cases, the law permits us to keep your personal information for longer, provided we put certain protections in place.

Where we have assessed there is a Legitimate Interest

If you are a citizen of any EEA country, we will not retain your personal data for longer than 2 years after a Legitimate Interest Assessment has been made or renewed, unless either;

We identify circumstances which in our reasonable and professional judgement indicate there is an ongoing Legitimate Interest; or

Where the Legitimate Interest we have relied on has expired, we have first (or since) obtained your consent (see below)

If you are not a citizen of the any EEA country, we may retain your personal details for longer than 2 years where we consider it worthwhile and justifiable, subject at all times to upholding your rights as a data subject.

Where you have provided Consent

We will retain your personal data for as long as we consider it worthwhile and justifiable, subject at all times to upholding your rights as a data subject (including the right for you to withdraw your consent and the right to have your personal data erased).

Even where you have given and not withdrawn your consent, we may at any point make the decision not to retain your personal data where we consider it to be no longer worthwhile and justifiable.

DATA SECURITY AND LINKS TO OR FROM OTHER ORGANISATIONS

We are committed to ensuring that your information is held securely in systems that can be controlled and protected in accordance with data security best practice. In order to prevent unauthorised access or disclosure we put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect from you. Where possible we only store information in structured systems (databases) which can only be accessed with secure passwords.

Occasionally it may be necessary to store or transfer some of your personal data in unstructured ways, such as on paper or in document formats that are necessary to enable us to collect and process that information in accordance with the purpose. In these cases, we will use all reasonable endeavours to ensure that procedures and controls are in place to maintain the security of and access to that information.

Unfortunately, the transmission of information via the internet is never completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to or from our website at all times and any transmission is therefore at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Our websites may contain links to other websites run by other organisations. Similarly, we may refer you from time to time to other organisations who are not Group companies and to whom you may also provide personal data. This policy does not apply to those other organisations where this happens, therefore we encourage you to read their separate privacy statements. We cannot be responsible for the privacy policies and practices of other websites or third parties, even if you access those websites or otherwise make contact with those organisations using links or contact details that we provide.

In addition, if you linked to our website, a contact details form, or any other material we have published electronically from a third party website or an email sent to you by a third party, we are not responsible for the privacy policies and practices of the owners and operators of those third parties and recommend that you check their privacy statements as well.

Where we collect and process any particularly sensitive personal information, for example your bank details, we will apply additional security controls to protect that data.

Where we have given (or where you have chosen) a password which enables you to access certain information we hold in any of our systems, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and to tell us as soon as possible if you think your password may have been stolen, exposed or compromised in any way.

COOKIES

Like many other websites, our website uses cookies.

A cookie is a small file which asks permission to be placed on your computer or mobile device's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can then tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better web experience by enabling us to monitor which information and pages you find useful and which you do not. A cookie does not give us access to your computer or any personal information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may however prevent you from taking full advantage of the website in question.

For more information on how we use cookies, please view our separate Cookies Policy.

MARKETING

We may collect your personal data and certain information about your preferences in interests in order for you to receive marketing information directly from us by email, SMS, and targeted online promotions in the following ways:

- If you register to receive information' on one of our websites
- If you receive and act upon a marketing campaign run by one of our marketing affiliates
- If you make a reservation enquiry in person, by telephone to one of our premises
- If you attend one of our hosted or sponsored events
- If you enter a competition or free prize draw we are running
- If you opt-in to receive newsletters, videos, or podcasts relating to our business or market
- If you engage with other electronic content we provide, including following one of our channels on a social media platform
- If you download our app to one of your devices
- If you purchase a product or service from us or one of our Group companies

In any of these cases listed above we may contact you with further marketing information in future in the ways mentioned in this policy, except where you indicate your preference not to.

We may contact you with marketing information by telephone, email or post, or with targeted advertising delivered online through social media and platforms operated by other companies by using your personal information. We may also use your personal information to tailor marketing to improve its relevance to you, unless you object to us doing so.

We will only share your information with third parties where they are;

- A Group company offering similar products and services but potentially under a different brand name.
- A data processor acting on our instructions as data controller as part of the means we use to send our marketing information to you and track whether you have received and/or acted on it.

Once shared, it will be the relevant third party's privacy policy will apply to their processing of your personal information, not ours. If you'd like to opt-out of receiving marketing from any of our Group companies we may share your information with, you can do so at any time by contacting them or using the unsubscribe links in any such information you receive from them.

From time to time, we may ask you to update your marketing preferences by asking you to confirm your preferences for the frequency and method of receiving future marketing information from us.

You have the right to opt-out of our use of your personal information to provide marketing to you in any of the ways mentioned above. Please see [Withdrawing your Consent](#) and [Objecting to our use of your personal information](#) above for further details on how you can do this.

YOUR RIGHTS

If you are a citizen of an EEA country you have a number of rights in relation to your personal information under data protection law, which are summarised below. Not all these rights may be applicable to citizens of countries outside the EEA. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to locate your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

- **Accessing your personal information**

You have the right to make a reasonable request for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information. You may in limited circumstances have a right of data portability (i.e. to ask us to create a file to transfer to you or a different service provider) of electronically-processed personal data held about you.

- **Correcting and updating your personal information**

The accuracy of your information is important to us and we are always keen to make sure we can regularly and easily review and correct the information that we hold about you. If any of personal information changes, in particular your name or address/email address and contact telephone numbers, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us as soon as possible using any of the details described at the end of this policy.

- **Withdrawing your consent**

Where we rely solely on your consent as the legal basis for processing your personal information, as set out under [How we use your personal information](#), you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our unsubscribe links included in any such marketing we send you electronically. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- **Objecting to our use of your personal information and automated decisions made about you**

Where we rely on an identified legitimate interest as the legal basis for processing your personal information for any purpose(s), as out under [How we use your personal information](#), you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with

your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our unsubscribe links in any such marketing we send you electronically.

- **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- **Complaining to the UK data protection regulator**

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website www.ico.org.uk for further details.

CHANGES TO THIS POLICY

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our website(s). In some circumstances we may also notify or contact you, for example by email, to let you know about the changes. Any such changes will take effect 7 days after the date on which we post the modified terms on our website. We recommend you regularly check for changes and review this policy whenever you visit our websites. If you do not agree with any aspect of the updated policy you must immediately notify us in order to ensure we are complying with our obligations in making sure you can exercise your rights.

CONTACTING US FOR FURTHER INFORMATION

Please direct any queries about this policy or about the way we process your personal information to our team responsible for legal matters and compliance using the contact details below.

If you wish to write to us, please write to Select Property Group Leisure Holdings Limited (legal and compliance team), The Box, Horseshoe Lane, Alderley Edge, Cheshire SK9 7QP, United Kingdom

Our email address for data protection queries is info@schoolforscandal.com

If you would prefer to speak to us by phone, please call 0161 322 2225

**SCHEDULE 1
GROUP COMPANIES**

Select Property Group (Holdings) Limited, company registered number 8958577

Select Property Group Limited, company registered number 5071388

Vita Student Management Limited, company registered number 08540975