# Privacy policy

Don's Kitchen is 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.

### 1. About us

In this Privacy Policy references to "we" or "us" or "Don's Kitchen" are to Don's Kitchen.

We are the data controller of any personal information you provide to us. This means that we are responsible for complying with data protection laws. This Privacy Policy describes what personal information we may collect from you, why we use your personal information and more generally the practices we maintain and ways in which we use and protect your personal information.

We have appointed a data protection officer to oversee our handling of personal information. If you have any questions about how we collect, store or use your information, you can contact our data protection officer using the details set out in "11. Contacting us".

### 2. Who do we collect information about?

Who do we collect information about?:

- Don's Kitchen website users
- Business contacts at our suppliers and staff

# 3. When do we collect personal information?

When do we collect personal information?

- When you apply for a policy (e.g. when you submit a request for a quotation), whether you complete that fully or not
- When you renew a policy (or a policy under which you are insured is taken out or renewed)
- Whenever you use the Don's Kitchen website
- If you respond to a customer survey, questionnaire, or marketing campaign
- If you contact us for any other reason
- When you buy any Private Dining Services from Don's Kitchen
- When you contact us through our "refer a friend" scheme
- When you enter a competition or prize draw

## 4. What personal information do we collect and use?

In order for us to provide Private Dining quotes we need to collect and process personal data about you.

Due to the nature of our business, we will never request and/or receive 'sensitive' data about you, known as special category data, for example information pertaining to your health, criminal convictions or credit status.

Please click on the relevant section below for detailed information regarding the types of personal information we are likely to collect and use about you.

#### **Personal information:**

- General information such as your name, address, address of the property or venue, contact details.
- Financial information such as your bank details, credit card and payment details, but only for the purpose of payment of our fees
- Information obtained through our use of cookies. You can find more information about this in our <u>Cookie Policy</u>
- Website browsing history
- Information captured during our telephone calls, whether inbound and outbound
- Your marketing preferences
- IP address
- Device ID information

#### We collect personal information from a number of different sources including:

- Directly from you or from someone else on your behalf
- From introducers and partners
- Through customer surveys and responses to various marketing campaigns
- From your use of our website and its cookies please see our Cookie Policy
- From inbound and outbound phone calls

Don's Kitchen has internal policy documents in place to ensure that any information used that's in the public domain or sourced from social media sites is used in line with our usual obligations.

# 5. What are the purposes for which your information is used?

We may process your personal information for a number of different purposes. For each purpose we must have a legal ground for such processing. When the information we process is classed as sensitive personal information, we must have an additional legal ground for such processing.

#### Generally we will rely on the following legal grounds:

- where we have an appropriate business need such as maintaining our business records or developing and improving our products and services where such business need does not harm your interests
- where we have a legal or regulatory obligation to use such personal information
- where the use is necessary to establish, exercise, or defend our legal rights
- where you have provided your consent to our use of your personal information

You will find details of our legal grounds for each of our processing purposes below.

#### 1. To set you up as a customer

Legal grounds:

- this processing is necessary for providing and administering your Private Dining Services
- Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests
- 2. Management of complaints (including communicating with you and resolving any complaints that you might have)

Legal grounds:

- Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests
- 3. Complying with our legal or regulatory obligations

Legal grounds:

- the use is necessary in order for us to comply with our legal obligations
- 4. Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)

Legal grounds:

- Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests
- 5. Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, and receiving professional advice (e.g. tax or legal advice)

Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

# 6. Provide marketing information to you (including information and marketing campaigns about our other products and services), in accordance with any preferences you have expressed

Legal grounds:

- Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests
- where you have provided your consent to our use of your personal information
- please see "section 10: what marketing activities we carry out" for further information, and please see section 12: \*The right to object to marketing.
- 7. Monitoring applications, reviewing, assessing, tailoring, and improving our products and services and similar products and services offered by Don's Kitchen

Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

#### 8. Tracing and recovering debt

Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

#### 9. Monitoring usage of any of the various Don's Kitchen websites

Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

# 10. Ensuring that content from our site is presented in the most effective manner for you and for your device

Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

# 11. Allowing you to participate in interactive features of our services, when you choose to do so

Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

12. Investigating or detecting the unauthorised use of our systems, to secure our system and to ensure the effective operation of our systems

#### Legal grounds:

- Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests
- 13. Carrying out customer research and customer insight exercises to understand our customers needs, to help us to improve and monitor our services and products

#### Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

#### 14. Ad-hoc communications and fulfilment of thank you notes, gifts, and other vouchers

#### Legal grounds:

• Don's Kitchen has a legitimate business need to use your data, but we ensure that we use personal information in a way that does not cause harm to your interests

# 6. Who do we share your information with?

From time to time we may share your personal information within the Don's Kitchen group, which is part of Travelers Inc., and with carefully vetted third parties. If you would like further information regarding the disclosures of your personal information, please see the details listed below. If you have further questions, please see section 11 for our contact details

#### 1. Disclosures to third parties

We do not disclose your information other than the third parties listed below for the purposes described in this Privacy Policy. These might include:

- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- online search engines
- social media platforms
- our third party service providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, payment processing agencies, document management providers, and tax advisers
- third parties who undertake analysis for the purposes of product improvement
- data providers who support us with developing our products and services

# 7. What marketing activities do we carry out?

#### 1. Marketing activities

Email marketing

We may also use your personal information to provide you with information by email about our products or services which may be of interest to you or to send eNewsletters. You have the option to opt out at any time.

If you wish to unsubscribe from emails sent by us, you may do so at any time by clicking on the "unsubscribe" link that appears in all emails. Otherwise you can always contact us using the details set out in section 14 to update your contact preferences, or email <a href="mailto:chefdon@donskitchen.uk">chefdon@donskitchen.uk</a>. In such circumstances, we will continue to send you service-related (non-marketing) communications where necessary.

#### SMS marketing

We might also use your personal information to provide you with information by text message about our products or services which may be of interest to you. You have the option to opt out at any time.

You can stop receiving text messages sent by us at any time by following the instructions in the text message on how to unsubscribe. This appears in all text messages. Otherwise, you can always contact us using the details set out in section 11 to update your contact preferences. In such circumstances, we will continue to send you service-related (non-marketing) communications where necessary.

#### *Telephone marketing*

We may also use your personal information to call you regarding products and services you have expressed an interest in, or which we believe may be of interest to you. You can opt out of receiving these calls at any point.

You can stop receiving telephone calls from us at any time by contacting us using the details set out in section 11 to update your contact preferences. In such circumstances, we will continue to send you service-related (non-marketing) communications where necessary.

#### Post

We may also use your personal information to provide you with information by post about our products or services or those of our partners which may be of interest to you. You have the option to opt out at any time.

You can stop receiving post from us at any time by contacting us using the details set out in section 11 to update your contact preferences. In such circumstances, we will continue to send you service related (non-marketing) communications where necessary.

TO STOP receiving any marketing communications from us please email <a href="mailto:chefdon@donskitchen.uk">chefdon@donskitchen.uk</a>

#### 3. If you have entered a prize draw or competition via any of our social media channels

If you enter a prize draw or competition via one of our social media channels such as Facebook, Instagram or LinkedIn we may collect your email address for the purpose of fulfilling the terms and conditions of such competition or prize draw. We may also use your personal information collected at competition sign up stage to provide you with information by email about our products or services or those of our partners which may be of interest to

you or to send eNewsletters. You can choose to receive such emails by clicking 'Yes' or 'No' on the social media page displaying the marketing option for the specific competition/prize draw. You will always have the option to opt out.

## 8. How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal, statutory, and regulatory obligations - in particular, for so long as there is any possibility that either you or we may wish to bring a legal claim or where we are required to keep your personal data due to legal or regulatory reasons. If you would like further information regarding the periods for which your personal information will be stored, please see section 11 below for our contact details.

# 9. Your rights

Under data protection law you have certain legal rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in section 11.

#### Please note:

• in some cases we may not be able to comply with your request (e.g. we might not be able to delete your data) for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make, and if we can't comply with your request we will tell you why

#### Your rights include:

- 1. The right to access your personal information You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Your information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible.
- 2. **The right to rectification** We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.
- 3. The right to erasure (also known as 'the right to be forgotten') In certain circumstances, you have the right to ask us to erase your personal information. Examples would include where the data is no longer required for the original purpose, consent has been withdrawn and there no overriding grounds for continuing the processing, or for compliance with the national law or for legal or regulatory obligations. There are occasions when a request made under data protection law is overridden by other legal and statutory data retention requirements.
- 4. The right to restriction or suspension of processing In certain circumstances, such as a question over its accuracy, you are entitled to ask us to stop using your personal information or to suspend its use.

- 5. **The right to data portability** In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice.
- 6. The right to object to marketing You can ask us to stop sending you marketing messages at any time. To STOP receiving all marketing communications from us please email <a href="mailto:chefdon@donskitchen.uk">chefdon@donskitchen.uk</a>
- 7. The right to lodge a complaint with the ICO We would hope that you will always raise any issues with us first, and that we will be able to resolve them to your satisfaction. However, if this isn't possible then you always have a right to complain directly to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations.

Please see below for contact details of the ICO:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: <u>0303 123 1113</u> (local rate) or <u>01625 545 745</u> (national rate)

Email: <u>icocasework@ico.org.uk</u>

Making a complaint will not affect any other legal rights or remedies that you have.

# 10. How we protect your information

We use a wide range of organisational and technical security measures to protect your information. This includes regular and thorough staff training about data security and data rights.

We restrict access to your information as appropriate within Don's Kitchen to only those who absolutely need to know that information for the purposes set out above.

Firewalls are used to block unauthorised traffic to the servers and the actual servers are located in a secure location which can only be accessed by authorised personnel. Our internal procedures cover the storage, access and disclosure of your information.

## 11. Contacting us

If you have any questions about how we collect, store or use your personal information, you may contact our data protection officer at:

Data Protection Officer Don's Kitchen

Email: <a href="mailto:chefdon@donskitchen.uk">chefdon@donskitchen.uk</a>

# 12. Updates to this Privacy Policy

From time to time we will make changes to this Privacy Policy, for example as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on 23 October 2023