POLICY STATEMENT

Admiral Taverns (Chester) Limited (‘Admiral Taverns’) takes your privacy seriously and this policy sets out the principles governing our use of the personal data you provide to us.

This policy describes how Admiral Taverns and its group of companies (including Pub Partnership Acquisitions Limited) use cookies and personal data obtained from you when you visit our websites (our Digital Applications), provide correspondence to us, by telephone and when you visit one of our pubs.

INTRODUCTION

We are the data controller in respect of any personal data we collect about you. Our data registration number is Z3027006. Pub Partnership Acquisitions Limited (PPAL) is registered separately with data registration number ZA665741.

Further information on this and our obligations to you can be obtained from the Information Commissioners Office.
INFORMATION WE COLLECT

When you register your interest in running one of our properties through our websites or at one of our events, we ask for certain information.

We may also collect and process information you provide to us by other means, such as by telephone or in other correspondence.

The information collected depends on the services you use and includes, but is not limited to, the following personal data:

- Name (Including Title)
- Date Of Birth
- Postal Address
- Email Address
- Telephone Number
- Gender

When you visit or use our Digital Applications we automatically collect certain information from you including:

- Location Data
- Domain Name Requests
- Server Log Details
- The Time You Spent On Each Page
- IP Address

Sensitive personal data, such as your racial or ethnic origin or physical or mental health details, may be shared during the course of our trading relationship; however this data is neither collected nor processed unless it is done so at your request (e.g. to assist with a beer delivery).

USE OF YOUR PERSONAL DATA

We may use your personal information for any or all of the following purposes:

- To provide our services to you
- To improve and/or personalise our services
- To respond to your enquiries
- For marketing purposes specific to an enquiry made by you
- Where you have agreed we may do so, to send you details of our offers and/or promotions, products, news and other services (including those of our selected partners) that we think may be of interest to you
- Analysis and research purposes
- To meet our legal obligations and/or establishing, exercising or defending our legal rights
- To help operate, maintain and improve our Digital Applications
- In the event of a sale of a property, we may be required to transfer tenant information relating to the relevant business being sold.
- To comply with Government guidelines issued for the hospitality and leisure industry regarding the COVID-19 pandemic, which includes the requirement for contact details of customers to be collected and stored for 21 days to assist the NHS Test and Trace programme.

We may also record or monitor calls, emails and other correspondence for training purposes to improve our services and to detect and prevent fraud.

CCTV

Admiral Taverns has CCTV systems installed in most of our tenanted and leased pubs in order to comply with our obligations under the Licensing Act 2003. Any CCTV imagery and data processed at those pubs is done so by the licensee of each property in connection with their business and Admiral Taverns is therefore not the data processor of that data.

However, PPAL has its own CCTV systems installed in their portfolio of pubs in order to comply with their obligations under the Licensing Act 2003 and to ensure the safety of customers and staff. If CCTV is present in one of those pubs, signage will be displayed in prominent positions advising of this. When you visit one of PPAL’s pubs, you may be captured on our CCTV systems which may cover the internal and external areas of those pubs.

Images captured on the CCTV systems will not be kept by PPAL for any longer than 60 days unless PPAL is required to do so by the conditions imposed by the premises licence for a pub, in connection with an incident or where the images are required for civil or criminal proceedings. PPAL will only disclose CCTV images when required to do so by a government organisation, statutory authority or the police when assisting them with their enquiries. PPAL will not release CCTV images to the media or publish them on the Internet, and any CCTV images are captured and stored on computer systems based in the UK. PPAL will not transfer this data outside of the UK and the EU.
SHARING YOUR PERSONAL DATA

In order to provide appropriate, timely and effective services it is sometimes necessary to share the personal information we process between our group of companies and with selected third parties, such as:

- Suppliers and service providers assisting with business activities, customers, payment processing services, web-hosting providers, IT support providers, providers of cloud-based software based outside the UK but within the EU, accountancy providers and law firms
- Ombudsmen, regulators, public authorities, the police, HMRC, the Information Commissioners Office and utilities providers
- Our group of companies
- Professional bodies, educators and examining bodies
- Vendors and/or prospective purchasers of the freehold or leasehold to one of our properties
- Credit reference agencies, debt collection and tracing
- Employees
- Current, past and prospective employers
- Employment and recruitment agencies
- The NHS, where your details are recorded for NHS Test and Trace purposes
- Sensitive personal data is not shared outside of the Admiral Taverns group, unless explicit consent to do so has been given by you or we are required to do so by law.

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We will only process your personal data where it is, either:

- Necessary for the performance of a contract with you (or to take steps at your request prior to entering into a contract)
- Necessary for administering justice, or for exercising statutory, governmental, or other public functions
- Carried out for legitimate interests required by you, us or a third party
- A legal obligation
- Consented to by you
- Necessary in relation to legal proceedings, for obtaining legal advice, or otherwise for establishing, exercising or defending legal rights
STORAGE OF YOUR PERSONAL DATA

We will keep your personal data for no longer than reasonably necessary and if you enter into a tenancy or lease with Admiral Taverns it will generally be stored for up to seven years after your tenancy has ended.

We may, however, retain your personal data for longer than this period in events where we need to fulfil our contractual obligations to you, the law requires us to maintain it for a longer period, you have not withdrawn your consent or it is necessary for legitimate interests required by us.

Your personal data will be kept safe and the appropriate technical, organisational and procedural safeguards, both physical and electronic, are implemented to protect it.

If you have not taken up a tenancy with us, but have entered your details on one of our Digital Applications or have provided your details over the telephone, we will store your contact details entered for one year so that we may notify you of future opportunities. You are able to unsubscribe to our mailing list at any time by choosing the ‘unsubscribe’ option in the footer of our email.

YOUR RIGHTS

It is your right to see, amend, update, transfer or in certain circumstances delete the personal data that we hold about you. You can also withdraw any consents you have provided to us in respect of our processing of your personal data.

These rights are known as Data Subject Access Requests and the Right to be Forgotten (also known as Data Erasure).

To exercise any of these rights, you should write to our head office, for the attention of ‘The Compliance Officer’, clearly setting out your requirements using either, or both, of the above subject headings. We recommend that correspondence is sent by recorded delivery and/or with proof of postage.

In normal circumstances a response will be issued to you within one month or, should your request be more complex, you will receive a response within a further two months; although we will contact you to confirm if this is the case.

If you believe we have processed your data wrongly, you can write to our Compliance Officer, who will carry out an independent investigation and report back to you within 14 days. If you are not satisfied with the response issued or believe the processing of your personal data is not in accordance with the law, you may wish to complain to the Information Commissioner’s Office (ico.org.uk/make-a-complaint).
CONNECTING TO THIRD-PARTY SERVICES, WEB URLS AND SOCIAL NETWORKS

Our services may contain links to third-party applications, services, tools and websites that are not affiliated with, controlled or managed by us. These services and links may also include social networking features. Additionally, you may choose to use your own social networking logins.

If you choose to connect using a social networking or other similar service, we may receive and store authentication information from that service to enable you to log in and other information that you may choose to share when you connect with these services.

We are not responsible for the security or privacy of any information collected by these third-parties and you should review the privacy statements or policies applicable to each third-party service that you connect to, use or access.

COOKIES

A cookie is a small file that is stored on your computer, mobile phone, tablet or other device when you visit a website or use an app.

Some cookies are deleted when you close your browser, known as session cookies. Others may remain on your device until they expire or you delete them. These are known as persistent cookies and they enable Admiral Taverns to recognise you as a unique user, allowing us to provide you with a better service whilst using and visiting our website www.admiraltaverns.co.uk.

Using and visiting our website www.admiraltaverns.co.uk means that you agree to our use of cookies and, whilst they do not harm your computer, you can choose to restrict or block them through your browser settings.

If you delete cookies relating to our website, we will not remember things about you, (including your cookie preferences), and you will be treated as a first-time visitor the next time you visit our website.

Websites operated by PPAL contain their own policy relating to the use of cookies and you should refer to each website in that respect. The cookies we use across our Digital Applications are:

<table>
<thead>
<tr>
<th>Cookie Name</th>
<th>Purpose</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>_ga</td>
<td>Used to distinguish users</td>
<td>Session</td>
</tr>
<tr>
<td>_gat</td>
<td>Used to distinguish users</td>
<td>Session</td>
</tr>
<tr>
<td>_gid</td>
<td>Used to throttle request rate</td>
<td>Session</td>
</tr>
<tr>
<td>_lang</td>
<td>Allows for language negotiation settings, enabling the language to be set</td>
<td>Session</td>
</tr>
<tr>
<td>_frontend</td>
<td>Used to handle user sessions during visits to our web store on our tenant support site</td>
<td>Session</td>
</tr>
<tr>
<td>_frontend_cid</td>
<td>Used to place orders during visits to our web store on our tenant support site</td>
<td>Session</td>
</tr>
</tbody>
</table>

Web beacons and pixel tagging are not used.
CHANGES TO THIS POLICY

We may, from time to time, amend the content of our privacy policy. Any changes made will be shown on this webpage or via a link on our homepage, at the point of data collection or by contacting you directly; however, we will not significantly alter how we process data that you have already provided to us without your prior agreement, unless we are obligated to do so.

CONTACT INFORMATION

If you have any questions, comments or wish to contact Admiral Taverns or PPAL to exercise any of your rights under this policy, please write to us at:

Admiral Taverns (Chester) Limited / Pub Partnership Acquisitions Limited
4th Floor - Suite B
HQ Building
58 Nicholas Street
Chester
CH1 2NP

Your correspondence should be addressed to The Compliance Officer.

To unsubscribe from any of our marketing activities you can do so by choosing the ‘unsubscribe’ option on the bottom of any of our email communications. Alternatively, please contact our Chester head office and we will process your request.