

## **Introduction**

Welcome to the Strada Trading Limited privacy notice.

Strada Trading Limited, trading as Coppa Club, Strada and 31 below, 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) or one of our restaurants and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. [Alternatively you can download a pdf version of the policy here [LINK]]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

### **1. Important information and who we are**

#### ***Purpose of this privacy notice***

This privacy notice aims to give you information on how Strada Trading Limited collects and processes your personal data when you visit our restaurants and through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service, take part in a competition, book a table and interact with our social media channels; such as Instagram, Facebook or Twitter (please check their privacy policies for more details).

This website is not intended for children and we do not knowingly collect data relating to children using this website or our social media accounts unless you choose to provide information relating to your children such as dietary requirements or allergen information when making a booking, and our processing of such data will be in accordance with this policy. As we have CCTV systems at our restaurants in order to protect the interests and security of our customers, staff and other visitors, data relating to children might be captured on those systems and so we set out in more detail below how and why we collect data using CCTV.

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.

#### ***Controller***

Strada Trading Limited is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice).

In light of our current processing activities, we do not have a statutory data protection officer but not to worry - if you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact [privacy@strada.co.uk](mailto:privacy@strada.co.uk) and a member of our privacy team will help you.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us at the details above in the first instance.

#### ***Changes to the privacy notice and your duty to inform us of changes***

This version was last updated on 24<sup>th</sup> May 2018 and historic versions can be obtained by contacting us at the details above.

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) without some delay as we are still working towards getting our systems ready for some of these changes.

most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) without some delay as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### *Third-party links*

This website may include links to third-party websites, plug-ins and applications. 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.

## **2. The data we collect about you**

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).

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, age, title and gender.
- **Contact Data** includes billing address, delivery address, email address, telephone numbers and social media accounts.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us or functionality you use on our site, such as our table booking function.
- **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.
- **Profile Data** includes your purchases, orders or bookings made by you, your interests, preferences, feedback and survey responses and any health and diet related information you choose to provide to us.
- **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.

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.

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, and genetic and biometric data, with exception of any applicable health related data (for example allergens and dietary requirements or any disability related requirements (for example in order to access and use our facilities) which you may decide is relevant to provide us during the booking process or in comments posted on our site or via our social media feeds. To confirm, we do not require nor request any such health data from you and you therefore choose to provide that to us and which we then process to perform the contract between us, for our mutual legitimate interests or some other lawful basis as may be set out below. We do not collect any information about criminal convictions and offences about users to this site or our customers (save in the highly unlikely event it relates to a matter with which we are involved directly).

information about criminal convictions and offences about users to this site or our customers (save in the highly unlikely event it relates to a matter with which we are involved directly).

### ***If you fail to provide personal data***

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity, Contact, Financial Data, Transaction, Marketing and Communications and Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise, or by attending our restaurants and engaging in transactions with us. This includes personal data you provide when you:
  - purchase foodstuffs and other goods at our restaurants;
  - apply for our products or service, including booking tables;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey or apply for an offer;
  - give us some feedback; or
  - engage with us via social media.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy links below for further details.
  - Coppa Club [LINK](#)
  - 31 below [LINK](#)
  - Strada [LINK](#)
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources (such as your social media accounts if you engage with us through your accounts) as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers such as Google based outside the EU;
    - (b) advertising networks such as Facebook based outside the EU; and
    - (c) search information providers such as Google based outside the EU.
  - Contact and Transaction Data from providers of technical, payment and delivery services such as Bookatable based inside the EU.
  - Identity and Contact Data from the following parties:
    - (d) third party affiliates and agents such a tour companies or other companies who organise events for groups and/or individuals and so who may make table bookings on your behalf for example; and
    - (e) publicly available sources such as social media accounts through which you choose to

(e) publicly available sources such as social media accounts through which you choose to engage with us.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

Please see the table below for a more detailed information about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us at the details above or clicking the unsubscribe box or link in our marketing emails.

#### *Purposes for which we will use your personal data*

We have set out below, in a table format, a description of the ways we knowingly plan to use your personal data and which will depend on how you use our site or deal with us at our restaurants, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 at the details above if you would like information 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Ensure your order conforms to your instructions and also your expectations in respect of health and dietary information which you might provide and any disability information you might provide to request appropriate access to our premises	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Profile	(a) Necessary for performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary for compliance with a legal obligation (to process payments and carry out accounting functions in accordance with UK laws (tax related and otherwise)) (d) Consent (if you have agreed previously or recently to sign up to marketing material or to keep receiving marketing material as part of the processing of your order) (e) Necessary to protect the vital interests of you or other guests attending our restaurants (by seeking to comply with your instructions on health/dietary and access requirements)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile	(a) Necessary for performance of a contract with you (b) Necessary for compliance with a legal obligation (your data protection

<p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey after a transaction</p> <p>(c) Dealing appropriately with your rights under relevant data protection legislation to provide to you, rectify, delete and transfer your data</p>	<p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary for compliance with a legal obligation (your data protection rights)</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey or apply for an offer on our site</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Necessary for performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data and security measures at our physical premises such as CCTV systems monitoring appropriate public areas at our restaurants)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and for the security of our premises and staff, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary for compliance with a legal obligation (to protect user data)</p> <p>(c) Necessary to protect the vital interests of you or other guests attending our restaurants or our staff and other visitors (by employing accepted and usual security systems such as CCTV monitoring of appropriate public areas)</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you whether on our</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

recommendations to you about goods or services that may be of interest to you whether on our site or via email or other direct marketing material	(b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications Data	(to develop our products/services and grow our business)  (b) Consent (if you have agreed previously or recently to receive our direct marketing material)

### ***Marketing***

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising the following personal data control mechanisms:

#### ***Promotional offers from us***

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

#### ***Opting out***

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at the details above at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions where we process your data in reliance of lawful bases other than consent.

### ***Cookies***

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see above links.

#### ***Change of purpose***

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 at the details above.

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.

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.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Specific third parties such as CRM (Client Relationship Management) software providers including Fishbowl who store our customer data and helps us to contact in a structured way and you can find their relevant privacy notice [here](#) (they are an independent third party and so we cannot give any guarantee about the information provided in their privacy notice), and Revinate who collects online feedback and reviews and you can find their relevant privacy notice [here](#) (they are an independent third party and so we cannot give any guarantee about the information provided in their privacy notice) and Bookatable and LiveRes who are assisting us with table reservation processes, you can find their privacy notes [here](#) and [here](#).
- 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.

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 (other than of course to satisfy their legal and regulatory obligations) and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use 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. For further details, see European Commission: EU-US Privacy Shield.

Please contact us at the details above if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. Data security**

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### ***How long will you use my personal data for?***

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and

for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

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.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the ICO website link below.

- [www.ico.org.uk](http://www.ico.org.uk)

If you wish to exercise any of the rights set out above, please contact us at [privacy@strada.co.uk](mailto:privacy@strada.co.uk).

### *No fee usually required*

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### *What we may need from you*

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### *Time limit to respond*

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at the details above.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## THIRD PARTIES

### *Internal Third Parties*

Staff, officers and self-employed contractors, and other companies in the Strada Trading Limited Group acting as joint controllers or processors and who are based in UK and provide IT and system administration services.

### *External Third Parties*

- Financial service institutions who facilitate our transactions with you (such as banks, building societies, credit card companies and visa payment or other online payment services companies) and who may be operating inside or outside of the UK or EEA and who may be operating as either as our data processors or joint controllers depending on the transaction.
- Service providers acting as data processors based in UK and USA who provide IT and system administration and security services, marketing services, digital marketing services, reservation services and data analytics services or physical premises (including CCTV security services).
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities or local councils acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances, including the Courts of England and Wales and elsewhere in the UK and the ICO, the Food Standards Agency and the Health and Safety Executive.

## YOUR LEGAL RIGHTS

You have the right to:

- 10.1 **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.
- 10.2 **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.
- 10.3 **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.
- 10.4 **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.
- 10.5 **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.

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.

10.6 **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.

10.7 **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.