

# DIRTY VEGAN

## PRIVACY POLICY

**Dirty Vegan restaurants** are committed to protecting and respecting your privacy.

We respect your privacy and are committed to protecting your personal information. This privacy notice will inform you as to how we look after your personal information when you visit our website, make a booking, enter our competitions or promotions or when you join any marketing rewards scheme. This privacy notice will tell you about your privacy rights and how the law protects you.

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 information about you so that you are fully aware of how and why we are using your information. This privacy notice supplements the other notices and is not intended to override them.

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

### Controller

C. Sulkin is our controller and is responsible for your personal information.

### Our contact details

Dirty Trading Limited t/a Dirty Vegan is a limited company with a registered office at 46a Carnaby Street, London, W1F 9PS. Our company number is 09964337. Our email address is [info@dirty-vegan.com](mailto:info@dirty-vegan.com) Dirty Vegan website may include links to third-party websites. 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.

### Personal information that we collect about you

We may collect, use, store and transfer different kinds of personal information about you:

- Identity information – such as your first name, last name, date of birth, gender and in some cases, job title
- Contact information –such as your company name, postal address, email address and telephone number
- Financial information – such as your payment card details
- Transaction information – such as details about payments to and from you and details of services you have purchased from us
- Technical information – such as information from your visits to our website and marketing emails, your 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 and
- Usage information – including information about how you use our website and services
- Any other information relating to you which you may provide to us
- Marketing and communications – including your preference to receive marketing emails from us

If you fail to provide personal information to us where we need to collect it 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 our 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.

## **How we collect your personal information**

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

**Information you give us.** You may give us information about you by filling in forms on our website [dirty-vegan.com](http://dirty-vegan.com) or when you visit us in one of our venues or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you make commit to our service (e.g. sign up to our e-shot or confirm a private event booking), participate in discussion boards or engage on other social media channels, enter a competition, promotion or survey, when you report a problem with our website or when you join any of our marketing or loyalty schemes or sign up to attend a marketing event.

**Information we collect about you.** As you interact with our website and e-shots, we may automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We collect this personal information by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.

### **Information we receive from other sources**

We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that information that it may be shared internally and combined with data collected on this website. We also can work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

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 information 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 certain usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **How we use your personal information**

We use information held about you in a number of ways in the provision of our services:

- to administer and protect our business and website, including troubleshooting, auditing and monitoring its use
- data analysis, system maintenance and support and survey processes
- to register new customers who have signed up to receive communications from us via our website
- to process your booking or private event including managing payments and fees
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us
- to provide and improve our services to you
- to notify you about changes to our service, terms or privacy policy
- to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

- to ensure that content from our website is presented in the most effective manner for you and for your computer
- to make suggestions and recommendations to you about goods, events or services that may be of interest to you

We use your personal information on the following bases:

- to perform a contract, such as engaging with an individual to provide our services
- to comply with legal and regulatory requirements
- 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, such as:
- to keep our records updated and to study how customers use our services
- to develop our products and services and grow our business
- to inform and update our marketing strategy
- for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise

### **Marketing**

Generally we do not rely on consent as a legal basis for processing your personal information other than in relation to sending direct marketing communications to you via email.

If you receive marketing communications from us and no longer wish to do so you may unsubscribe at any time by clicking the 'unsubscribe opt-out' links on any marketing e-shot message sent to you or by notifying us at any time that you wish to opt-out at [info@dirty-vegan.com](mailto:info@dirty-vegan.com)

Similarly, you can ask 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 any time at [info@dirty-vegan.com](mailto:info@dirty-vegan.com).

You may receive marketing communications from us if you have requested information from us or made an enquiry or booking with us or if you provided us with your details when you entered a competition or registered for a promotion via a third party website partner and, in each case, you have opted in to receive that marketing.

### **Change of purpose**

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law

### **Sharing your personal information**

We may be required to share your personal information with certain trusted third parties in accordance with certain contractual obligations that we have with them and to assist us in providing you with our services, including:

- Customer relationship managers and business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- 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
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions, contracts and other agreements; or to protect the rights, property, or safety of Dirty Bones, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

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- Customer relationship managers and business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- 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
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions, contracts and other agreements; or to protect the rights, property, or safety of Dirty Bones, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

### **How we protect your personal information**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **How long we keep your personal information**

We will only keep your personal information for as long as necessary to fulfil the purposes we collected it for. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means. We also take into account legal and regulatory requirements which require the retention of personal information for a minimum period of time, limitation periods for taking legal action, good practice and Dirty Vegan general business purposes.

### **International transfers of your personal information**

We do not transfer your personal data outside the European Economic Area.

### **Your rights regarding your personal information**

You have certain rights under the European Union's General Data Protection Regulations and other data protection laws in relation to your personal information. You have the right to request access to an/or correct or delete any personal information about you held by us. You may also withdraw consent at any time where we are relying on consent to process your personal information. 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 our services to you. We will advise you if this is the case at the time you withdraw your consent. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

### **More Information**

If you have any queries regarding this Privacy Policy please contact our Data Controller by email at [info@dirty-vegan.com](mailto:info@dirty-vegan.com)