



Privacy Policy Statement

Last Updated May 2024

1. Privacy and Your Personal Data

1.1 Pizza Pazzi Limited is committed to protecting the privacy of our users and customers. This privacy policy ("Privacy Policy") is intended to inform you on how we gather, define, and utilise your Information (as defined below).

1.2 It applies to Information collected by us, or provided by you, whether in our restaurant, over our website (including the mobile optimised version of the website accessible from your portable hand-held device), our Pizza Pazzi App, or in any other way (such as over the telephone or our WHATSAPP group). It is also intended to assist you in making informed decisions when using our Website, App and our products and services. Please take a minute to read and understand the policy.

1.3 All your personal Information shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. If you want to know what information we collect and hold about you, or to exercise any of your rights as set out in **Section 9** below, please call us on the number below, write to us at the below address or via e-mail at pizzapazzauk@gmail.com

The Manager

Pizza Pazzi

282 Wightman Road, London N8 0LT

Telephone: 020 83517790

1.4 Pizza Pazzi Limited is the controller of your Information for the purposes of the GDPR and is a company registered under number 10332304.

2. What Information Do We Collect on our Website?

2.1 When you visit our website (including the mobile optimised version of the website accessible from your portable hand-held device) you may provide us and necessary third parties such as our payment platform provider with personal information such as name, postcode, email address, mobile phone number, credit, debit, or PayPal account details (where applicable for the purposes of payment only). You may also provide us with Information in a number of ways:

a) by supplying us with the Information as listed above, on an individual basis by registering to use our mobile APP, website or subscribing to receive news, updates or offers from us. To become a registered user, you must provide us with your name, postcode, email address, and or mobile phone number if subscribing to our WHATSAPP group but you may also provide us with additional information if you choose to do so:

b) by corresponding with us by email, in which case we may retain the content of your email messages together with your email address and our responses.

c) by booking a table, ordering a takeaway online using our Collection service or Delivery service, or downloading our offers

d) through any preferences and areas of interest as advised by you on subscribing to our online services.

e) by Information provided when you use our App or joining our WHATSAPP group (see below); and

f) by Information provided when you use our mobile optimised website from your portable hand-held device including details of your physical location, where you have agreed to it being used.

2.2 We may collect Information about your computer, including where available your IP address, operating system, browser type and the geographical location of your computer, for system administration purposes. We may also report aggregate information to our advertisers. This is statistical data about browsing actions and patterns and does not identify you as an individual.

3. What Information do we collect on our App?

3.1 When using our App, you may provide us with the following Information:

a) your name and contact details (email address and mobile telephone number), if you use the App to book a table at our restaurant.

b) further information (mobile phone number, feedback information etc) if you use the App to register or subscribe to receive updates or offers from us. To become a registered user or to subscribe, you must be 18 or over (we may ask you to provide proof of age), you must provide us with your name, postcode, email address, but you may also provide us with additional information if you choose to do so.

c) information which allows us to identify your credit or debit account details to complete a transaction with you, where applicable and via our secure third-party platforms.

d) your physical location, where you have agreed to it being used for the purposes of delivery via the App or where you allow the App to access your location settings; and

e) other Information that may be provided by you when adding content to our App, or to our social network pages such as Facebook, Instagram, TikTok etc.

4. What Information do we collect in our restaurant or elsewhere?

4.1 When you are in our restaurant, we may allow customers to connect directly to our Wi-Fi service using a secure password, so no data will be collected.

4.2 We may from time to time ask you to complete a feedback form and or sign up to receive our news and updates directly.

4.3 Private Hire: We will need to collect relevant data in order to facilitate your booking, this will include name, contact telephone number, email address.

5. How we use your Information

5.1 We will hold, use and disclose your Information for our legitimate business purposes including:

a) to keep you up to date about important changes to our business.

b) to direct-market products and services (including push notifications), advise you of news and industry updates, events, promotions and competitions and other information. Before we do so, you will be given an option to opt-out of such communications and an option to unsubscribe will also be provided with each communication. Regulation 22 of the Privacy and Electronic Communication Regulations allows us to send direct electronic marketing to you about the same or similar products you have ordered from us, as long as you are given an

opportunity to opt out at the point of the data collection and in every subsequent message.

c) to apply profiling technology which analyses our customers' engagement with our direct marketing communications, activity, and interests so that we can send you content that is relevant to you.

d) to answer your queries.

e) to provide further services to you by sharing your Information with our trusted third parties. Further details about this are set out in the section 8 below on Sharing your Personal Information.

f) to release Information to regulatory or law enforcement agencies if we are required or permitted to do so.

g) to facilitate a Private Hire booking of the restaurant

5.2 We may process certain sensitive personal data (known as special category data in GDPR) where you include it in information you send to us e.g. if you include information about your health in booking requests. We have processes in place to limit our use and disclosure of such sensitive data other than where permitted by law.

6. The legal basis for processing your Information

6.1 Under GDPR, the main grounds that we rely upon in order to process your Information are the following:

a) **Necessary for compliance with a legal obligation** – we are subject to certain legal requirements which may require us to process your Information. We may also be obliged by law to disclose your Information to a regulatory body or law enforcement agency;

b) **Necessary for the purposes of legitimate interests** - either we, or a third party, will need to process your Information for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your Information protected. Our legitimate interests include responding to requests and enquiries from you or a third party, fulfilling takeaway, optimising our website and customer experience, informing you about our products, services and other information we think you will be interested in based on your interactions

with us and purchase history, and ensuring that our operations are conducted in an appropriate and efficient manner;

c) **Consent** – in some circumstances, we may ask for your consent to process your Information in a particular way.

7. How we share your Information

7.1 In certain circumstances we will share your Information with other parties. Details of those parties are set out below along with the reasons for sharing it.

a) **Trusted third parties:** In order to provide certain services, we will share your information with third party service providers such as IT infrastructure companies and email logistics providers. We also work with other trusted online partner platforms such as Just Eat and Uber Eats so where applicable we may need to share information; however, we will not share your data with any third party where it is not necessary to do so to provide a service to you.

b) **Regulatory and law enforcement agencies.** As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

c) **New business owners.** If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, you will be sent notice of such event.

8. How long we hold your Information

We will only retain your Information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept. For example, if we receive your Information through a competition entry, we will retain your data for as long as is necessary to administer the competition. If you have consented to receive direct marketing from us, we will not directly market to you for longer than three (3) years from the date you last visited our restaurant, where we have asked you to complete a feedback form or sign up to our “news and events” in person, made a purchase (via Collection, Delivery, Reservations, Private Hire of our Restaurant via our website or our App) booked a table or downloaded a voucher, (if applicable) unless you consent to receive direct marketing by opting in again before the

expiry of that three (3) year period. In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation, or for fraud detection purposes.

9. Your rights relating to your Information

9.1 You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

a) **Right of Access.** You have the right at any time to ask us for a copy of the Information about you that we hold, and to confirm the nature of the Information and how it is used. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

b) **Right of Correction or Completion.** If Information we hold about you is not accurate, or is out of date or incomplete, and requires amendment or correction you have a right to have the data rectified, updated, or completed. You can let us know by contacting us at the address, telephone or email address set out above.

c) **Right of Erasure.** In certain circumstances, you have the right to request that Information we hold about you is erased e.g. if the Information is no longer necessary for the purposes for which it was collected or processed, or our processing of the Information is based on your consent and there are no other legal grounds on which we may process the Information.

d) **Right to Object to or Restrict Processing.** In certain circumstances, you have the right to object to our processing of your Information by contacting us at the address, telephone or email address set out above. For example, if we are processing your Information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your Information for direct marketing purposes.

You may also have the right to restrict our use of your Information, such as in circumstances where you have challenged the accuracy of the Information and during the period where we are verifying its accuracy.

e) **Right of Data Portability.** In certain instances, you have a right to receive any Information that we hold about you in a structured, commonly used, and

machine-readable format. You can ask us to transmit that Information to you or directly to a third-party organisation.

This right exists in respect of Information that:

- you have provided to us previously; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third-party organisation's systems. We are also unable to comply with requests that relate to Information of others without their consent.

9.2 You can exercise any of the above rights by contacting us at the address, telephone or e-mail address set out above. You can exercise your rights free of charge.

9.3 Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

10. Consent

To the extent that we are processing your Information based on your consent, you have the right to withdraw your consent at any time. You can do this by unsubscribing via the link provided in any direct marketing communication or contacting us at the address, telephone or email address set out above.

11. Cookies

11.1 Similar to other commercial websites, our website and APP uses a technology called "cookies" and web server logs to collect information about how our website is used. A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies.

11.2 Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website, and the websites visited just before and just after our website.

11.3 Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our website and or APP and which parts

of the website and or APP are most popular. This helps us gather feedback so that we can improve our website and better serve our customers. Cookies do not allow us to gather any personal Information about you and we do not generally store any personal Information that you provided to us in your cookies.

11.4 We use 'session' cookies which enable you to carry information across pages of the Website and or APP avoid having to re-enter information. Session cookies enable us to compile statistics that help us to understand how the Website is being used and to improve its structure.

11.5 We also use 'persistent' cookies which remain in the cookies file of your browser for longer and help us to recognise you as a unique visitor to the Website, and or APP tailoring the content of certain areas of the Website to offer you content that match your preferred interests. (please see our Cookie Policy for further information)

12. Changes to our Privacy Policy

This privacy policy can be changed by us at any time. If we change our privacy policy in the future, we will advise you of material changes or updates to our privacy policy by e-mail, where we are holding your e-mail address. We will not email you to advise of minor updates that will not materially impact you, but this policy will always state when it was last updated so you can check any changes that have been made.

13. Complaints

If you are unhappy about our use of your Information, you can contact us at the address, telephone, or e-mail address above. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 11113

Website: <https://ico.org.uk/concerns/>

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