

Albertine Privacy Policy

Data protection

We will never share your information with another organisation for their own marketing purposes and we will never sell your information for any reason whatsoever.

As you use our website, get in touch with us, join our mailing list, book tables in our restaurant, we collect information. Some of this information will be anonymous such as which pages you visit on our websites, and some will contain your personal information such as when you book a table or join our email list. Be assured that we will always endeavour to be clear, honest and transparent with you about the information we collect, and wherever practical will ask your specific consent.

When do we collect information about you?

When you give it to us directly via a website form, email, phone, letter, business card or in person.

You may give us your personal data when you book a table (directly or via OpenTable), come to one of our wine tastings or events, join our newsletter list or organise your own party with us. Also when you apply for employment with us, or contact us in another way.

When you visit our website

We use cookies to identify you when you visit our website and to enable us to personalise your online experience (for example when you log into a password protected area).

What type of information is collected from you?

Typically we will ask for your name, email address and other contact details. Additionally we will collect or request other information where it is appropriate to do so, for example:

- The email list(s) that you have subscribed to
- The location of your organisation/business and services you offer
- Details of your event(s)
- Your job title or profession, if relevant to our work, e.g. journalist

We will also collect anonymous information about your computer and your visits to our website including your IP address, geographical location, browser type, referral source, length of visit and number of page views. We will not link this to you individually. Such information helps inform us about our website and digital communications development.

In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent.

If you come to one of our wine tastings or other events, it is possible that your photograph may be taken and used for publicity, such as our website, newsletters or media work. We will always give attendees at our events an opportunity to opt out of having their photo taken or used. If you object to having your photo taken, please let us know.

If you have made a donation to Sustain and agree to Gift Aid that donation, we must record the fact that you are a UK tax payer and we have to maintain a record of the amount of Gift Aid we have collected.

For what purposes do we collect information about you?

The overview below summarises the different reasons why we may collect and use your data. We may not use your personal information for all of these purposes, it will depend on the nature of your relationship with us, and how you interact with Albertine:

1. **Promotions and Communications:** Our main communications are to update you on the latest news from Albertine, and we may invite you to participate in activities such as wine or food events, competitions, special offers, or other activities. We might ask you for feedback on, for example, an event you have attended or your experience of eating and drinking at Albertine; and we might tell you about other events or new wines and food offers that we think might be of interest to you. In general these communications will be by email, but may also be e.g. via online, by phone, by post or in person at events.
2. **Food and drink trading:** Albertine offers a range of food and drink services to the public, from our bar, to upstairs restaurant bookings, party and event catering, and regularly holds ticketed events, and we also sell wine, gift vouchers and other items to take away. If you attend an event, we may store your personal information to invite you to similar events in future. Albertine never stores personal financial information, except for some personal financial information of employees to enable, for example, salary and pension payments.
3. **Analysis and tailoring of communications:** We will make use of the information you have given us and your interactions with our services, to help us understand your interests and may tailor and personalise our communications to you.
4. **Staff administration:** We process the personal information of our employees for recruitment, staff administration, remuneration, pensions and performance management purposes.

On what lawful grounds do we process your personal information?

- Information is processed on the basis of an individual's consent.
- Information is processed in line with a contractual relationship.
- Information is processed on the basis of legitimate interest.

We may also share your personal information when we are compelled to do so by a legal authority acting in compliance with the law.

Consent

We will only send promotional material by email to those who have given consent, usually to send you updates on Albertine's wine list and food menus, our events, competitions and special offers. Occasionally, our promotional material may – for example – invite you to an event or promote items for sale, eg. From our wine shop.

Where you give us consent to process your data we will always keep a clear record of how and when this consent was obtained. You can withdraw your consent at any time, or request that all your personal data be deleted by emailing: hello@albertine.london

Contractual relationships

Most interactions with our customers are voluntary and not contractual. However, sometimes it will be necessary to process personal information so that we can enter contractual relationships with people. For example, if you apply for employment or to supply us with products or services.

Legitimate interests

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use is fair, balanced and does not unduly impact individuals' rights). We will always work to these principles to process your personal data, including on the unusual occasion when it is not practical or appropriate to ask for explicit consent.

What are Albertine's legitimate interests?

Governance:

- Delivery of core business – to provide a high quality food and drink experience for all our customers, and a venue for hosting events and parties.
- Reporting criminal acts and compliance with the legal instructions of law enforcement agencies.
- Internal and external audit for financial or regulatory compliance purpose.
- Reporting to our funders and statutory bodies.

Publicity of Albertine:

- Conventional direct marketing by post, email and other forms or marketing, publicity or advertisement.
- Unsolicited commercial or non-commercial messages
- Personalisation to tailor and enhance the supporter experience in our communications.
- Exercise of the right to freedom of expression or information.
- Understanding better our customers, including the use of publicly available information.

Operational management:

- Employee and supplier recording and monitoring for recruitment, safety, performance management or workforce planning purposes.
- Provision and administration of staff benefits such as pensions.
- Physical security, IT and network security.
- Maintenance of 'do not contact' lists.
- Processing for historical, research or statistical purposes.

Financial management and control:

- Processing of financial transactions and maintaining financial controls (noting that we do not hold personal financial information, except for some personal financial information of employees to enable, for example, salary and pension payments).
- Prevention of fraud, misuse of services, or money laundering.
- Enforcement of legal claims.

Purely administrative purposes:

- Responding to enquiries and bookings.
- Delivery of requested products and services

- Administration of financial transactions.
- Providing 'thank you' communications and receipts.
- Maintaining 'do not contact' lists.

When we use your personal information, we will always consider if it is fair and balanced to do so and whether it would be within your reasonable expectations that we would use your data in this way.

We will balance your rights and our legitimate interests to ensure that the way in which we use your data never goes beyond what you would expect and is not unduly intrusive or unfair.

Do we store your financial details?

Albertine uses iZettle and Stripe to process all online financial transactions. We will transfer selected personal data – normally your name and email address – that is necessary for the processing of payments. We will never store your personal financial details. The only exception is if you are an Albertine employee – and then only for specific purposes such as payment of salary and pension.

Do we collect data about children?

Our website and other communications are targeted at persons over the age of 18. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data. We operate a strict policy in line with the Licensing Act 2003 not to serve alcoholic beverages to anyone under the age of 18. We also request date of birth on our mailing so that we do not promote wine-related activities to under-age individuals.

How long will we keep your data?

Unless still required in connection with the purpose(s) for which it was collected – such as for an email newsletter list - we will usually remove your personal information from our records ten years after the date it was collected. However, if you or your organisation work with Albertine, or act as a supplier or shareholder, we may keep your personal information on record for longer.

If you ask us to stop sending you emails or other forms of communication, we will keep your name on our internal suppression list (a 'do not contact' list) to ensure that you are not contacted again.

If you exercise your 'right of erasure', we will remove your personal information completely and immediately.

Is your personal information secure and who can access it?

We will never publish or share your data unless we have received your prior clear and informed consent.

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure of or access to your personal information.

Your information is only accessible by appropriately trained staff and volunteers, who agree to abide by this policy.

Occasionally we use external service providers to process data on our behalf – such as sending address details to a mailing house to post magazines, or to email broadcast services who will send out our campaign and project updates on our behalf.

What are your rights?

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to be unsubscribed from our email list at any time. You also have the following rights:

- Right to be informed – you have the right to be told how your personal information will be used.
- Right of access – you can ask what information we hold on you and to request a copy.
- Right of erasure – you can request that all your personal information is deleted from our records.
- Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
- Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
- Right to data portability – you may ask us to provide your information to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the information in question to hello@albertine.london. You can unsubscribe from our email list by clicking the link at the bottom of any email received, or by emailing us at hello@albertine.london

To make a complaint about the way we have processed your data to the Information Commissioner's Office ("ICO") please see the guidance at <https://ico.org.uk/for-the-public/personal-information>. The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us/>.

Does this policy cover third party websites?

No, this Policy does not cover external websites and services that we link to and we are not responsible for the privacy practices or content of those sites or services.

Where can you update your information?

Generally you can check the personal data we hold about you, and update it by clicking on the "update my preferences" link at the bottom of any email we send you.