

Privacy policy

The Red Lion Hollington

We value the privacy of those who provide personal data to us. This policy applies to our customers, personnel that work for our customers, website visitors, consumers, distributors, our suppliers (and potential suppliers), personnel of such suppliers and contractors. It describes:

- the data identifying you that we collect;
- how we use this data;
- the legal basis upon which we process it;
- with whom it is shared; and
- how it is stored.

This policy also describes other important topics relating to your data and its privacy.

Please read this privacy policy carefully to understand how we handle your personal data.

By accessing or browsing our website, contacting us on social media, working with or for us, offering your goods or services to us, using any of the goods and services that we provide to you or otherwise providing your data to us (including when entering competitions or when attending our events or breweries), you confirm that you have read and understood the entirety of this privacy policy.

The Policy is comprised of the following Sections:

- Section 1: Data collection
- Section 2: Use of data
- Section 3: Legal basis for use of your personal data
- Section 4: Cookies
- Section 5: Disclosure of personal data
- Section 6: Retention of personal data
- Section 7: Your rights
- Section 8: Marketing
- Section 9: Transfers of data
- Section 10: Security
- Section 11: Third party websites
- Section 12: Changes to our Privacy Policy
- Section 13: Further questions or making a complaint

1. Data collection

We may receive some data about you directly from you. However, we may also receive data about you from third parties such as your employer or recruitment agency, retailers where you are a customer, media agencies, market research companies, our suppliers, group companies, public websites, agencies (including booking agents) and public agencies (including customs officials), which we refer to as "Third Party Sources" throughout this policy.

We, or third parties on our behalf, may collect and use any of the following data about you and we refer to this as "personal data" throughout this policy:

1.1 Personal data which you give us (or which we receive from Third Party Sources). You or your employer or recruitment agency may give us personal data about yourself by using the online forms provided on our website, completing order forms, setting up an account with us, or by contacting us by phone, e-mail or other means. This includes, for example, when you or your employer provide your personal data to us in order to receive our services. You, or our Third Party Sources may also give us personal data about you when you are or it is offering or providing services to us.

The personal data which you give us (or which we receive from Third Party Sources) may include:

- a. Data about you:
 - i. your name;
 - ii. your job title;
 - iii. company name;
 - iv. e-mail address;
 - v. your telephone number;
 - vi. account information;
 - vii. your company's address;
 - viii. your gender;
 - ix. your date of birth;
 - x. data provided when you correspond with us;
 - xi. any updates to data provided to us; and
 - xii. if you attend our sites, CCTV footage.
- b. Data about our website visitors and users of our software apps (where applicable):
 - i. if you visit our website, your IP address;
 - ii. your user name;
 - iii. your age;
 - iv. your behaviour on our website (for example, the pages that you click on) or on our software app;
 - v. payment details;
 - vi. order history; and
 - vii. if you are a user of a mobile application, your location data so that we can help you to locate our products and services and, if you are a service provider, so that we can monitor the effectiveness and efficiency of any services that you provide to us.
- c. Data about the goods or services we provide to you:
 - i. data needed to provide goods or services to you (including data on account opening forms, details of your order, order history, payment details, delivery address, delivery requirements and restrictions, trade references and tax information);
 - ii. the name you give us for personalised products;
 - iii. customer services data; and
 - iv. customer relationship management and marketing data.
- d. Data about services that we receive from you or your employer (including breweries, bars, wholesalers, restaurants, media contacts,

transport suppliers, warehouses, fulfilment centres, technical support equipment providers and engineers, brand ambassadors and other contractors):

- i. your website;
 - ii. your photo and video footage if you are a collaborator or brand ambassador, or a potential collaborator or brand ambassador;
 - iii. CVs, pitch and tender data; and white paper data;
 - iv. supplier due diligence data (for example for wholesalers of alcohol);
 - v. work contact data (phone number, postal address, mailing address, email address);
 - vi. proof of identification and address;
 - vii. visa or work permit documentation;
 - viii. emergency contact data;
 - ix. work place accident data and medical or health data (relevant to your work for us and/or provided by you to Asahi, for example, medical assessments);
 - x. work hours (overtime and shift work, hours worked and department standard hours);
 - xi. details of compensation, expense claims and bank details;
 - xii. drug and alcohol testing and health assessment data;
 - xiii. court, tribunal and inquiry proceedings; and
 - xiv. data required to access company systems and applications (such as system ID).
- e. If you choose to use social media in order to contact us or find out about our products or services, your profile data (including your preferences and interactions with us on Facebook, Instagram and Twitter) and data which you post on message boards which are relevant to our business.
- f. If you attend our events, your photograph and event video footage (we will also give you notice of this at the event).

Some of the personal data that we collect about you or which you or third parties (including your employer or recruitment agency) provides to us about you may be special categories of data. Special categories of data include data about your physical and mental health.

Please note that we need certain types of personal data so that we can provide services to you or so you, or our Third Party Sources, can provide services to us. If you do not provide us with such personal data, or if you ask us to delete it, you may no longer be able to access our goods and services or provide goods and services to us.

1.2 Personal data we collect about you or that we obtain from our Third Party Sources.

(a) Each time you visit our website we may automatically collect any of the following data:

(i) technical data, including the Internet protocol (IP) address used to connect your computer to the internet, domain name and country which requests data, the files

requested, browser type and version, browser plug-in types and versions, operating system and platform;

(ii) data about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), time and length of visits to certain pages, page interaction data (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and data provided when requesting further service or downloads.

(b) If you contact us on social media, we will collect certain data about you from your social media page and through your interactions with us or with data about our products and services.

(c) If you are a journalist or work for an institution/trade association in our industry, we may collect data about you from public sources.

(d) If you are a customer or a supplier (or a potential customer or supplier) or work for one of them (including as a consultant), we may obtain data about you from your company's website.

(e) If you are working for us or visiting one of our sites (for example, a brewery) we may also collect personal data about you on CCTV.

2. Use of data

We, or our Third Party Sources acting on our behalf, collect, use and store the personal data listed above for the following reasons:

2.1 Visiting our website or, if you are a consumer, using one of our software apps

- a. to allow you to access and use our website or the app (including to ensure you are of legal drinking age);
- b. to provide technical support;
- c. to provide you with the information and services that you request from us;
- d. to ensure the security of our services, our website and our app;
- e. to store information about your preferences, and to allow us to customise our website and the app according to your individual interests;
- f. to recognise you when you return to our website;
- g. to enable you to participate in our competitions and promotions;
- h. to process orders which you place for goods or services from us to enable us to receive and manage services from you (including supplier due diligence, payment and expense reporting and financial audits);
- a. for health and safety records and management;
- b. to assess your working capacity (for example, to assess whether you are under the influence of drugs or alcohol and thereby pose a danger to yourself and to others);
- c. to confirm information on CVs and performance reference checks, to assess you or your employer's suitability to work for us; and

d. for equal opportunities monitoring.

2.2 Providing goods and services to you

- a. to provide relevant goods or services to you or your employer (including, to confirm and process orders, for administration of your account with us, customer loans, tax and export, billing and debt collection purposes and the collection of bottles (where applicable));
- b. to deal with any enquiries or issues you have about our goods and services, including any questions you may have about how we collect, store and use your personal data, or any requests made by you for a copy of the data we hold about you. If we do not have a contract with you, we may process your personal data for these purposes where it is in our legitimate interests for customer services purposes;
- c. to send you certain communications (including by email or post) about our goods and services such as service announcements and administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges);
- d. to allow you to attend our events or participate in competitions and to send you photos that you have permitted us to take of you;
- e. for health and safety and quality assurance;
- f. to carry out statistical analysis and market research; and
- g. if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters), but only where you have consented to this.

2.4 For internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies.

2.5 To comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so.

2.6 To establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

2.7 If you contact us on social media, to monitor your interactions with us and our brand online, where it is in our legitimate interests to do so for market research and for planning future marketing campaigns.

2.8 If we use your photograph or video footage from an event, to amplify the event to a broader audience and for internal presentation purposes, where it is in our legitimate interests for marketing and business development purposes or where we have your consent.

3. Legal basis for use of your personal data

3.1 We consider that the legal bases for using your personal data as set out in this privacy policy are as follows:

- a. our use of your personal data is necessary to perform our obligations under any contract with you (for example, to fulfil an order which you place with us, to comply with the terms of use of our website or software app which you accept by browsing our website or by downloading our software app and/or to comply with our contract to provide services to or receive services from you or your employer); or
- b. our use of your personal data is necessary for complying with our legal obligations (for example, providing information to HMRC); or
- c. where neither (a) nor (b) apply, use of your personal data is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website or our mobile app). Our legitimate interests are to:
 - i. run, grow and develop our business;
 - ii. operate our website
 - iii. select appropriately skilled and qualified suppliers;
 - iv. ensure a safe working environment for our staff and visitors;
 - v. marketing, market research and business development;
 - vi. provide goods and services to our customers, make and receive payment, provide customer services and to know the customer that we are providing services to;
 - vii. place, track and ensure fulfilment of orders with our suppliers; and
 - viii. for internal group administrative purposes, as described in section 5.1 below.

3.2 We may use your special categories of data where you have provided your consent (which you may withdraw at any time after giving it, as described below).

3.3 In the future, other use of other personal data may be subject to your consent (which can be withdrawn at any time after giving it, as described below). Where this is the case, that need for consent will be identified in this privacy policy.

3.4 If we rely on your consent for us to use your personal data in a particular way, but you later change your mind, you may withdraw your consent by contacting us at info@theredlionhollington.co.uk and we will stop doing so. However, if you withdraw your consent, this may impact the ability for you to be able to provide services to us (for example, if those services require health assessments that involve use of your special categories of data) or for us to provide services to you.

4. Cookies

4.1 Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website, mobile apps or use our apps. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.

4.2 Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies

(including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.

5. Retention of personal data

We keep your personal data for no longer than necessary for the purposes for which the personal data is processed. The length of time we retain personal data for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

6. Your rights

6.1 You have certain rights in relation to your personal data. If you would like further information in relation to these or would like to exercise any of them, please contact us by email at info@theredlionhollington.co.uk at any time. You have the right to request that we:

- a. provide access to any personal data we hold about you;
- b. update any of your personal data which is out of date or incorrect;
- c. delete any personal data which we are holding about you;
- d. restrict the way that we process your personal data;
- e. prevent the processing of your personal data for direct-marketing purposes;
- f. provide, or not provide, your personal data to a third party provider of services;
- g. provide you with a copy of any personal data which we hold about you;
or
- h. consider any valid objections which you have to our use of your personal data.

6.2 We will consider all such requests and provide our response within a reasonable period (and in any event any time period required by applicable law). Please note, however, that certain personal data may be exempt from such requests in certain circumstances.

6.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

7. Marketing

7.1 We may collect and use your personal data for undertaking marketing by email, telephone and post.

7.2 We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

7.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal data to any third party for such marketing.

7.4 If you wish to stop receiving marketing communications, you can contact us by email at info@theredlionhollington.co.uk at any time.

8. Third party websites

Our website, social media pages may, from time to time, contain links to websites operated by third parties including partner networks and our group companies. Please note that this privacy policy only applies to the personal data that we collect through our website, social media pages or which we receive from Third Party Sources, and we cannot be responsible for personal data about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal data to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

9. Changes to our privacy policy

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy. By continuing to use the services and our website, or to offer and/or provide services to us you are confirming that you have read and understood the latest version of our privacy policy.

10. Further questions or making a complaint

10.1 If you have any queries or complaints about our collection, use or storage of your personal data, or if you wish to exercise any of your rights in relation to your personal data, please contact info@theredlionhollington.co.uk. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data

The practices described in this privacy policy statement are current personal data protection policies, as of 17 October 2022.