

Underground Cookery School Website Privacy Policy

This page is designed to help you understand why and how we use your personal data through your use of our Underground Cookery School website at undergroundcookeryschool.com. By personal data we mean information that relates to a living individual and which can identify or be identified with that individual.

We are Underground Cookery Barbican Limited, a company with number 06412152 and registered office at 201/203 City Road, London, England, EC1V 1JN.

Below, we have tried to provide you with as much information as we possibly can to explain how your personal data may be used. We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you

If you have any questions about this document or how we handle your personal data, you may contact us by:

- email on matt@undergroundcookeryschool.com;
- writing to us at The Underground Cookery School, 201/203 City Road London EC1V 1JN; or
- phoning us on 020 3981 7816.

What personal data do we collect about you?

We will collect and process the following data about you:

- **Information we collect about you.** Each time you visit our website we will 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 and location, browser plug-in types and versions, and operating system and platform and other technology on the devices you use to access this site; and
 - information about your visit, including the full URL, clickstream to, through and from our website (including date and time), resources you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and the methods used to browse away from the page.
- **Information you give us.** This is information about you that you give us by filling in any forms on our website or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you complete an enquiry form, when you report a problem with our website and when you book a cookery school event from us.

Your personal data will be kept confidential and secure and will only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy and applicable data protection laws.

Under data protection law, we can only use your personal data if we have a proper reason, e.g:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or

- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains how we use your personal data for and the basis on which we use your data

When information is collected	What information we ask for	How and why we use your information including the basis on which we use your data
<p>Information we collect about you: when you use our website</p>	<p>Data that indirectly identifies you such as your IP address, mobile device ID and location data. This data does not include anything that allows us to identify you by name or contact details.</p>	<p>We process this to retain and evaluate information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as intended.</p> <p>We rely on consent to use cookies to understand how our website is used to improve the user experience and as the lawful basis for collecting and using your personal information.</p>
<p>Information you give us: when you contact us by email or complete our online forms</p>	<p>Contact details: <i>your name and email address</i></p>	<p>We ask for this:</p> <ul style="list-style-type: none"> — to respond to your enquiries — to enable you to book an event at our cookery school — to provide you with information relating our business. <p>We rely on consent to provide you with information relating to our business and as the lawful basis for collecting and using your personal information to enable us to provide you with such marketing information.</p> <p>We rely on legitimate interests as the lawful basis for collecting and using your personal information to respond to general enquiries which you may make to us.</p> <p>Our legitimate interests relate to our commercial interests including the promotion and growth of our business.</p> <p>We will keep this information for as long as necessary for the relevant processing purpose.</p>

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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us at matt@undergroundcookeryschool.com.

What happens if you don't provide the personal data we have asked for?

Where we have stated that your personal data is used in order to carry out a contract with you, to take steps to enter into that contract we will need you to provide the personal information requested. If you don't provide the personal information we need when we ask you for it, we may not be able to respond to you, enter into a contract with you or meet our obligations under the contract. For example, if you don't give us your contact details, we may not be able to answer a query you have raised. If you have any concerns about whether you need to provide your personal information, please:

- email us on matt@undergroundcookeryschool.com;
- phone us on 020 3981 7816; or
- write to us at The Underground Cookery School, 201/203 City Road London EC1V 1JN.

Who do we share personal data with?

Internally, we only grant access to personal data to those people that need access to that data to carry out their role.

Externally, we may share from time to time personal data with the following categories of recipients:

- our service providers, for instance:
 - the companies that manage our IT infrastructure;
 - companies that provide us with cloud based IT systems; and
 - our external advisors, for instance IT consultants, accountants and lawyers,
- our regulators, law enforcement, intelligence services and other government authorities, where they require us to do so; and
- potential buyers of or investors in our business where necessary in connection with a due diligence exercise.

Where we share personal data with external parties we will always ensure that the recipient is committed contractually to only use personal data in compliance with our instructions and data protection law.

How long will your personal data be kept?

We will not keep your personal data for longer than we need it for the purpose for which it is used. Unless we explain otherwise to you, we will retain your personal data on the basis of the following guidelines:

- for as long as we have a reasonable business need, such as managing our relationship with you and managing our business;
- for as long as we provide services and then for as long as someone could bring a claim against us (in general this is a period of 6 years); and/or
- in line with legal and regulatory requirements or guidance.

When it is no longer necessary to keep your personal data, we will delete or anonymise it.

Transfers of personal data outside of the United Kingdom

European Economic Area (“EEA”) countries are all EU Member Countries together with Iceland, Liechtenstein and Norway. The United Kingdom has now left the EU. At present, we generally store and process personal data in the United Kingdom. However, in some circumstances the third parties who assist us in providing the services (suppliers), may transfer personal data outside the EEA.

Where suppliers do so, we require our suppliers to transfer personal data in compliance with UK data protection laws, typically requiring them to enter into standard contractual clauses approved by the UK Government as providing equivalent protection to what would be in place had the personal data remained in the EEA.

We can provide more information on the countries outside of the EEA to which we transfer your personal data on request.

Third Parties

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.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. 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.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security.

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

Do we use your personal data to make automated decisions?

You will not be subject to decisions that will have a significant impact on you based solely on automated decision making (i.e. one without human intervention).

Your rights and how to exercise them

The law gives you certain rights in respect of the personal data that we hold about you. Below is a short overview of those rights (for more information about the rights you have in respect of your personal data please visit the Information Commissioner’s Office website: www.ico.org.uk).

- **Access.**

With some exceptions designed to protect the rights of others, you have the right to a copy of the personal data that we hold about you.

Access to the personal data we hold about you is free of charge however, we may make a reasonable charge for additional copies of that data beyond the first copy, based on our administrative costs.

- **Correction.**

You have the right to have the personal data we hold about you corrected if it is factually inaccurate. This right does not extend to matters of opinion.

- **Deletion.**

You have the right to have personal data that we hold about you erased (“the right to be forgotten”) where: (i) we don’t need your personal data anymore; (ii) you withdraw your consent to our use of your personal data and we have no other legal basis to keep your personal data; (iii) you have asked us to review and explain our legitimate interests to you and we don’t actually have a valid legitimate interest to do what we are doing; (iv) our use of your personal data is illegal; (v) we have to delete your personal data to comply with our legal obligations.

- **Objection.**

You have the right to object to our processing of your personal data where we rely on “legitimate interests” as our legal basis for processing, but we may be able to continue processing if our interest outweighs your objection.

- **Opting out of marketing.**

You have the right to require us to stop using your personal data to send you marketing information. If you want us to stop sending you marketing information, the quickest and most efficient way is to use the provided “unsubscribe” links in our communications (although you can contact us direct if you prefer).

- **Temporary Restriction.**

You also have the right in some circumstances to request that temporary restrictions are placed on how we process your personal data, for example if you contest its accuracy so we can if your personal data is correct or where we are processing it on the basis of our legitimate interest and you ask us to review and explain our legitimate interests to you so that we can check whether we actually have a valid legitimate interest to do what we are doing.

- **Transfer**

You have the right to move, copy or transfer your personal data in order for you to obtain and reuse this for your own purposes across different services, where your personal data has been provided to us in a structured, commonly used and machine-readable format and where we are using your personal data on the basis of your consent or on the basis that it is necessary to perform a contract with you and the use we are making of your personal data is carried out by automated means.

- **Withdrawing Consent**

If we are processing your personal data on the basis of your consent, you have the right to withdraw that consent at any time, in which case we will stop that processing.

Please be advised that in certain circumstances withdrawal of consent to continue processing your personal data may have further impact on your future access to, or benefit from, the service or part of the service.

To exercise any of your rights you can:

- email us on matt@undergroundcookeryschool.com;
- phone us on 020 3981 7816; or
- write to us at The Underground Cookery School, 201/203 City Road London EC1V 1JN.

Please note that in order to protect your privacy, we may ask you to prove your identity before we take any steps in response to a request you have made.

We treat the protection of your personal data with the utmost importance but if you have cause to complain, we would always ask that you contact us first so we can attempt to resolve the matter for you. However, you also have the right to lodge a complaint about our handling of your personal data with the Information Commissioner's Office. You can contact them on 0303 123 1113 or via their website www.ico.org.uk/make-a-complaint

Changes to this policy

We may change this privacy policy at any time. Where we make significant changes, for instance where we use your personal data for materially different purposes, we will email you to let you know.