

# **SWIZZLESTICK LIMITED (T/A PATCH BARS) PRIVACY POLICY**

## **INTRODUCTION**

Swizzlestick Limited ("Swizzlestick", "we", "us", or "our") respects your privacy and is committed to protecting your personal data. This privacy policy (the "Policy") will inform you as to how we look after your personal data when you visit our website [www.patch-bar.co.uk](http://www.patch-bar.co.uk) (the "Website") (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you and your data.

This Policy aims to give you information on how Swizzlestick collects and processes your personal data through your use of this Website, including any data you may provide through this Website when you sign up to our newsletter, submit an enquiry, or make a booking.

It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements the other policies and is not intended to override them.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

Swizzlestick Limited, a company registered in England and Wales with number 04292099, whose registered address is at Moorgate House, King Street, Newton Abbot, Devon, TQ12 2LG is the data controller and responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, please contact the data privacy manager using the details set out below:

Full name of legal entity: Swizzlestick Limited

Name of data privacy manager: Andrew Buchanan

Email address: [andy@swizzle-stick.co.uk](mailto:andy@swizzle-stick.co.uk)

Postal address: 58-60 Carter Lane, London, EC4V 5EA

### **Changes to this Policy and your duty to inform us of changes**

Amendments and updates to this Policy may be made from time to time. Any revisions will be posted on the Website and where appropriate notified to you by email, so you will always be aware of what information we collect and how we use that information. Please review the Website and this Policy regularly so that you are aware of any changes

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

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymised data).

We may collect, use, store and transfer different kinds of personal data about you including first name, surname, date of birth, email address, telephone number and your preferences in receiving marketing from us and our third parties and your communication preferences.

### **If you fail to provide personal data**

Where we need to collect personal data 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 proceed with your reservation). In this case, we may have to cancel a product or service you have requested from us but we will notify you if this is the case at the time.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

You may give us your name, email address, phone number and date of birth by filling in forms on the Website or by corresponding with us by post, phone, email or otherwise.

As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns through our processor, Propeller Communications who employ the use of cookies, unique identifiers, web beacons and similar tracking technologies on the Website. This data may also include your internet protocol (IP) address, the type of browser and operating system you use to access the Website, the date and time of your visit, the pages you visit, and the internet address of the site from which you accessed the Website.

## **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- 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;
- where we need to comply with a legal or regulatory obligation;
- where you have provided your consent.

### **Purposes for which we will use your personal data**

We have set out below a description of all the ways we plan to use your personal data:

- to send you our newsletter where you have requested us to do so;
- to process your request for a group booking at one of our sites;
- to process your request for private hire at one of our sites; or
- to engage with you on social media.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

### **Change of purpose**

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with this Policy where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data in the following circumstances:

- With the Access Group entity, "Design my Night", specifically for the purpose of using Collins, our booking and enquiry management software and who act as a data processor on our behalf and who process your personal data in accordance with their privacy policy which you can view here: <https://www.designmynight.com/privacy-policy>.
- With Propeller Communications, who act as a data processor on our behalf and who process your personal data (collected as set out above).
- 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 Policy.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not transfer your personal data outside the European Economic Area (**EEA**).

## **6. MARKETING**

You can ask us or 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 [enquiries@patch-bar.co.uk](mailto:enquiries@patch-bar.co.uk).

You will receive marketing communications from us if you have requested information from us or made a booking with us and, in each case, you have not opted out of receiving that marketing.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **8. DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **9. DATA STORAGE**

Personal data you provide to Swizzlestick is stored on third party servers. We take measures to ensure that any third parties hosting our Website and other services have adequate security measures in place to protect personal data.

## **10. YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request").

**Request correction** of any inaccuracies in the personal data that we hold about you.

**Request erasure** of your personal data under certain circumstances.

**Object to processing** of your personal data under certain circumstances.

**Request restriction of processing** of your personal data in certain circumstances.

**Request the transfer** of your personal data to you or to a third party in certain circumstances.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

**Make a complaint** at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you wish to exercise any of the rights set out above, please contact us at [andy@swizzle-stick.co.uk](mailto:andy@swizzle-stick.co.uk) or in writing to Andrew Buchanan, Swizzlestick Limited, 58-60 Carter Lane, London, EC4V 5EA.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**11. THIRD-PARTY LINKS**

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 policy of every website you visit.

## 12. COOKIES

In common with many websites, we use “cookies” to help us gather and store information about visitors to our Website. A cookie is a small data file that our server sends to your browser when you visit the Website. The use of cookies helps us to assist your use of certain aspects of the Website. You can delete cookies at any time or you can set your browser to reject or disable cookies.

We primarily use information from cookies for the following purposes:

- Traffic monitoring, e.g. the internet protocol (IP) address from which you access the Website, the type of browser and operating system used to access the Website, the date and time of your access to the Website, the pages you visit, and the internet address of the site from which you accessed the Website.
- To register you in programs and to recognise your website preferences.
- To recognise repeat visitors for statistical and analytical purposes.
- Anonymous tracking of interaction with online advertising, e.g. to monitor the number of times that a banner ad is displayed and the number of times it is clicked.
- To compile and report to third parties (such as advertisers) aggregate statistics about our users in terms of numbers, traffic patterns and related Website information.
- We may also use clear gifs (also known as web bugs or web beacons), which are tiny graphics embedded in web pages and email messages that we use, in connection with cookies, to collect non-personal information from users to analyse Website usage, manage content on the Website, track visits to other related sites, and track the performance of online advertising.
- We may also connect the information that we collect through cookies and clear gifs with other personal information that you provide to us in order to monitor your use of our Website in order to make our communications to you as relevant as possible and for other marketing and advertising research purposes.

We use the following cookies on the Website:

<b>Provider</b>	<b>Name</b>	<b>Purpose</b>	<b>More Info</b>
Google Analytics	_ga _gid _gat	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Google Privacy policy</a>
Google	CONSENT	Cookie consent setting	<a href="#">Google Privacy policy</a>
Google	NID	The NID cookie contains a unique	<a href="#">Google</a>

		ID that Google uses to remember your preferences and other information, such as your preferred language (e.g. English), how many search results you wish to have shown per page (e.g. 10 or 20) and whether or not you wish to have Google's SafeSearch filter turned on.	<a href="#">Privacy policy</a>
Google	1P_JAR	Used to gather website statistics, and track conversion rates.	<a href="#">Google Privacy policy</a>
New Relic	JSESSIONID	Used to store a session identifier so that New Relic can monitor session counts for an application.	<a href="#">New Relic Cookies</a>
Matterport.com	__tld__ ajs%3Atest ajs%3Acookies ajs_user_id ajs_group_id ajs_anonymous_id	Our 360° tour is provided by Matterport, who may use cookies to analyse video usage and improve their product and content offerings.	<a href="#">Matterport Privacy Policy</a>
Facebook	fr	Used for advertisement purposes	<a href="#">Facebook privacy policy</a>

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.