

PRIVACY AND YOUR PERSONAL DATA (Last updated 20th October 2022)

We are committed to protecting the privacy of our users and customers. This privacy policy is intended to inform you how we gather, define, and utilise your Information.

It applies to Information collected by us, or provided by you, whether in one of our restaurants, over our Websites (including the mobile optimised version of the websites accessible from your portable hand-held device), our Fish'n'Chick'n, Churchill's or Banker's App or Click & Collect online ordering website or in any other way (such as over the telephone). It is also intended to assist you in making informed decisions when using our Websites and our products and services. Please take a minute to read and understand the policy.

All your personal Information shall be held and used in accordance with the EU General Data Protection Regulation on 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 please write to us at the below address or via email The Chesterford Group, Chesterford House, 14 Start Hill, Stansted Distribution Centre, Bishop's Stortford, Herts, CM22 7DG.

Churchill's Fish and Chips and Bankers Fish & Chips are trading names of Fishnchickn Ltd. Fishnchickn Ltd is the data controller of your Information for the purposes of the Act and is a company registered in England and Wales with company registration number 01018600. Our registered office is at Chesterford House, 14 Stansted Distribution Centre, Start Hill, Bishop's Stortford, CM22 7DG.

WHAT INFORMATION DO WE COLLECT ON OUR WEBSITE?

When you visit one of our Websites you may provide us with personal information such as name, email address and local shop ("Information"). You may provide us with Information in a number of ways:

- By supplying us with the Information as listed above, on an individual basis by registering as a Registered User and subscribing to receive updates or offers from us. To become a Registered User you must provide us with your name, email address and local shop.
- 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; and
- By using our Click & Collect, downloading our offers, or applying for a job with us;
- By Information provided when you use our App (see below); and
- We may collect information about your computer, including where available your IP address, operating system and browser type and the geographical location of your computer, for system administration. This is statistical data about browsing actions and patterns and does not identify you as an individual.

WHAT INFORMATION DO WE COLLECT ON OUR APP/ONLINE ORDERING WEBSITES?

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

- your name and contact details (email address and mobile telephone number),
- information which allows us to identify your credit or debit account details to complete a transaction with you for your takeaway or using the 'order at table' function via the App;

- your physical location to locate your nearest store

Each time you visit our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products 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 methods used to browse away from the page and any phone number used to call our customer service number.
- Information we receive from other sources. We are working closely with third parties (including, for example, business partners, and sub-contractors in technical and payment services) and may receive information about you from them.

WHAT INFORMATION DO WE COLLECT IN OUR RESTAURANTS?

When you are in one of our restaurants, we may collect the following Information when you use the Churchill's Wi-Fi service:

- your name and email address and your physical location, whilst you are in the restaurant only

COOKIES

Similar to other websites, our Websites and app use a technology called "cookies" and web server logs to collect information about how our Website/app 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.

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

We use 'session' cookies which enable you to carry information across pages of the Website and 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.

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, tailoring the content of certain areas of the Website to offer you content that match your preferred interests.

You can refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website.

HOW DO WE USE THE INFORMATION THAT YOU PROVIDE TO US?

We use your Information in the following ways:

- to ensure that content from our Websites and apps are presented in the most effective manner for you and your computer or device;
- to allow you to register with us on our Websites where you choose to do so; in accordance with your wishes as communicated to us at the point of Registration; if you have given your consent at the point of Registration, to contact you with information about products, services and special offers that you request from us, or that we feel may be of interest to you or to ask you to participate in one of our customer satisfaction surveys; an opportunity to unsubscribe will be provided with each communication
- to respond to enquiries, feedback, complaints or job applications
- All data collected from enquiries, general feedback and complaints is stored on a secure server. It may be processed by staff who work for us. or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

How we use information you give to us:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the products that you order from us;
- to respond to your enquiries about our products and services;
- to provide you with information about other products we offer that are similar to those that have purchased already or enquired about, or which we feel may interest you.
- to send you our regular email marketing. We will only send email marketing to you if you have opted-in to receive it. If you no longer wish to receive email marketing from us please contact us on customerservice@tcg-ltd.co.uk;
- to notify you about changes to our service
- to ensure that content from our site and app is presented in the most effective manner for you and for your computer or your device

How we use information we collect about you:

We may pass your Information to carefully selected third party organisations including:

- Business partners and suppliers in connection with the performance of any contract we enter into with you
- Trusted third parties: In order to provide certain services, we will share your information with third party service providers such as IT infrastructure companies (restaurant bookings/click and collect services/ Gift Card/ WiFi providers) and email logistics providers. We will not share your data with any third party where it is not necessary to do so to provide a service to you.
- 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.

• Fish'n'Chick'n, Churchill's & Banker's Fish and Chips have an account with MailChimp, which is an email-marketing provider. MailChimp will store IP Addresses, information about links you click on within the emails, email addresses, names and local store selections that are captured when you become a Registered User. We need to provide MailChimp with such information for the purposes of use in relation to the Services, but not for any other purpose. If you contact Mail Chimp directly regarding your subscription to our email marketing, MailChimp may contact you directly; otherwise, MailChimp will never contact you. You are always free to unsubscribe from our email-marketing list at any time. To find out further information about MailChimp's Data Protection and Terms of Use go to: <https://mailchimp.com/legal/privacy/>

• Fish'n'Chick'n, Churchill's & Bankers Fish and Chips collect customer contact details and purchase data for the purposes of serving an online transaction. When customers opt in, this data is used to send marketing communications or business update as requested by the customer. The Chesterford Group is the data controller (defined by ICO). The Chesterford Group use services provided by Impact Data to manage this data on behalf of The Chesterford Group. Impact Data are the data processor (defined by the ICO). Impact Data provide marketing software that allows The Chesterford Group to store, manage and communicate with their customers. Impact Data do not own or sell customer data. Impact Data use web servers hosted in Australia and the USA. These servers are EU privacy shield compliant to

comply with EU GDPR laws. To find out more about Impact Data go to: <https://www.impactdata.com.au>

- We use Google Analytics to help us better understand how our users interact with our websites. The data recorded may include your geographical location, how you were referred to us, the device and browser you are using, the duration of your visit to our website and the pages that you have viewed. For information on how Google Analytics collects and processes data, go to: <https://policies.google.com/privacy?hl=en-US>

Social Media

When you visit our Social Media pages, we may collect certain technical information automatically from your device (e.g device type) as well as how your device has interacted with our Social Media pages which will inform our marketing activities. Such information may include what pages have been visited and the links that have been clicked. This information is used to improve the quality and relevance of our social media content to our audiences. More information on how Facebook collects and uses information can be found here: <https://www.facebook.com/policy.php> We also display targeted advertising via our Facebook and Instagram platforms, based on user interests and demographics. For information on your ad preferences click here: <https://www.facebook.com/help/109378269482053>

Facebook Pixel

We use the Facebook pixel on our websites which is a piece of code that tracks how website users use our website, their on-site behaviours and actions, and monitors what happens after a Facebook user clicks on a Facebook advert that takes them through to the website. The data collected from our Facebook Pixels may also be used for the purpose of retargeting and custom audience building for our future Facebook advertising (which are then published on Instagram and Audience Network platforms too). Facebook and its partners can also use the information collected for its own advertising purposes on or off Facebook. More information on how Facebook collects and uses information can be found here: <https://www.facebook.com/policy.php> To opt out of ads, click here: <https://www.facebook.com/help/568137493302217>

Social Media Customer Service

If you reach out to us on social media, we will respond using the same channel that you contacted us on unless the enquiry is complex and requires us to disclose your personal data for further follow up. In such instances, we will ask for your contact details to continue the discussion or use the contact details you provided when you placed your order.

If you tag our page in your Instagram post we may ask for your permission to allow us to share your image on our Instagram page. If you decline the request we will not post your image.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our terms and conditions of supply of goods and other agreements; or to protect the rights, property, or safety of Fish 'n' Chick'n Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Google Maps

We may use the Google Maps Application to gather information about your location, which will improve your experience when browsing our website. To learn about Google Maps Privacy Policy click here: <https://policies.google.com/privacy>

- Our Click and Collect and Order at Table service (App and Desktop site) are powered by QikServe. QikServe will store names, mobile numbers, email addresses. To find out information about QikServe's Privacy Policy go to: <https://qikserve.com/privacy-policy/>

• Our Wi-fi is provided by Meraki, a subsidiary of Cisco. Please find further information regarding their Data Protection Terms and Conditions here: <https://meraki.cisco.com/trust#privacy>

HOW CAN YOU ACCESS AND CORRECT YOUR INFORMATION?

You may request to access, amend or delete all your Information that we collect by writing to us at the following address. We will require evidence of your identity before we are able to act on your request.

Data Controller, The Chesterford Group, Chesterford House, 14 Start Hill, Stansted Distribution Centre, Bishop's Stortford, Herts, CM22 7DG.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at customerservice@tcg-ltd.co.uk.

YOUR CONSENT

By using our Websites/apps you consent to our collection and use of the Information as described in this Privacy Policy. If we change our privacy policies and procedures, we will post those changes on our Website or otherwise notify you to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it.

WHERE WE STORE YOUR PERSONAL DATA

Data and Information that we collect from you may be transferred to and stored at a destination outside the European Economic Area ("EEA"). You consent to our sending and storing your Information outside the EEA. We will take all steps reasonably necessary to ensure that your Information is treated securely and in accordance with this Privacy Policy.

We will always hold your information securely. It may be processed by staff who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing and/ or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We do not retain details of credit card or debit card information used by our customers when placing orders for our products.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site or our app, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

SECURITY

We maintain the highest standards of security, however the transmission of information via the internet is not completely secure. So, whilst we will do our best to protect your Information, we cannot ensure the security of your data transmitted to our Website or app. Any information you submit is sent at your own risk. Once we have received your Information we will use strict procedures and security features to prevent unauthorised access.

THIRD PARTY SITES

Please remember that when you use a link to go from our websites/apps to another website/app, our Privacy and Cookies Policy is no longer in effect. Your browsing and interaction on any other website, including websites which are linked to ours is subject to that website's own rules and policies.