

## Privacy Policy

We, at Marston's PLC, care about and respect your privacy. We'd like to explain what personal information we have about you and how we use it, as well as letting you know about our practices with regard to your privacy so that you know exactly what is happening with your data and what we are doing to keep it safe.

We are Marston's PLC! You may also know us as Marston's Beer Company, Marston's Inns & Taverns, Revere Pub Company or one of our other trading divisions or group companies from time to time. Where we refer to "we" or "us" in this policy, we mean PLC or any company or division in our group.

If you have any questions about this policy or your privacy, you can find us or get in touch at Marston's House, Brewery Road, Wolverhampton, WV1 4JT. Our telephone number is 01902 711811.

We have appointed a Data Protection Officer for Marston's PLC who can be contacted via [DataSecurityInformation@marstons.co.uk](mailto:DataSecurityInformation@marstons.co.uk).

We are registered in England & Wales with Company No. 31461 and our VAT number is GB100019352.

### **The Law**

Data Protection within the UK is currently governed by the General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations ("**Data Protection Laws**") and we conduct our activities in line with these.

In relation to this website we are the Data Controller and CST Group Ltd ([cst-group.com](http://cst-group.com)) are the data processor as the host and administrator for this site. We ask you read our website terms of use in conjunction with this policy.

This privacy policy supplements other notices and privacy policies and is not intended to override them. It should be read in conjunction with other privacy policies that 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.

A Glossary is also included at the end of this document to explain some of the terms we use in this privacy policy.

## **+What information do we collect?**

We collect a wide variety of information and the types we collect from you will vary dependent on whether you're an individual customer, another business, ordering a product or a service or participating in a promotion or competition (amongst other things). Here are the types of information we may collect from time to time along with sources which tell you where we may receive the data from.

Information we may gain directly from you:

- Your name, age & contact details (including phone numbers, emails and addresses);
- Your opinions, feedback, comments or views;
- Your banking details or payment card information;
- Your business details (which may include contact details, job titles and other information you would be expect to share when engaging in business with us);
- Your login details (including username and password);
- Your image within photography;
- Special Request data which may include special category data such as Disability & accessibility requirements, dietary requirements or other information that may be deemed sensitive; and
- Your employment history and application data (including CV's).

Information we may collect about you:

- Internet protocol address (IP address);
- Browser type and version;
- Time zone setting;
- Browser plug-in types and versions;
- Operating system and platform;
- The URL Clickstream to, through and from our site (including the date and time);
- Products you viewed or searched for;
- Page response times;
- Download errors;
- Length of visits to certain pages;
- Page interaction (scrolling, clicks, mouse-overs etc);
- Methods used to browse away from the page; and
- Phone numbers used to call our customer services team.

Information we may receive from other external third parties:

- Names, addresses, contact details/business details if necessary through the course of business;
- Financial information, such as the results of a credit check; and
- Advertising preferences & analytical information (in particular from social media websites, pixels, clickstream data, cookies and Google Analytics).

We strive to collect the minimum amount of data necessary in order to perform the request for a product or service being made and so in some cases, failure to enter the requested information may result in us not being able to provide the product or service.

### **+When do we collect your information?**

We may collect your information in a number of ways. Here is an overview of the circumstances in which data is gathered.

- When you use our websites or a form is filled out on our websites (including from analytics);
- Correspondence via phone, email or otherwise with one of our team members;
- When you register to use our site or services;
- When you subscribe to our products or services;
- When you purchase shares in our company;
- When you place an order with us;
- If you have an accident at one of our sites;
- When you or an analytics provider provide us with your marketing preferences (including where we use the services of social media platforms to determine your potential interest in a product or service);
- When you sign a contract or agreement with us;
- To participate in a discussion board or other social media function on our sites;
- To enter a competition, promotion or survey that we are running;
- When you report a problem with one of our websites;
- When you apply for a job with us;
- When we require a credit check in conjunction with your application; and
- When you visit our offices.

### **+Why do we need your personal data?**

There are a number of reasons we may request or collect your information. A summary of these can be found below:

- For the administration and support of a contract such as an order of goods, a trade agreement, an operations agreement or a service you've requested;
- For the administration of a job application;
- For the administration of your shareholding;
- To conduct a credit check in line with your application (if required);
- To request ongoing credit reference services to ensure your ongoing suitability for credit terms (if required);
- To respond to an enquiry, feedback or complaint you may have sent to us;
- To improve the products or services we offer;
- To administer our websites including troubleshooting, data analysis, testing, research, statistical and survey purposes. Also to keep it safe, secure and accessible;
- To administer a promotion, offer or competition that you may participate in;
- To notify you about any changes to our services; and
- For the communication of marketing materials (including e-mail, advertisements on social media, and in certain circumstances, phone calls);
- For absolute clarity we do not intend our marketing materials to be received by anybody under the age of 18 due to the nature of our business. Your personal data may be used to determine whether you meet this criteria.

## **+Marketing**

We may use your details to make an informed decision on products or services we think you may be interested in. This is marketing and we will always ask for your consent before we do this where we intend to send you materials via e-mail or text. We will also always ask your consent before we pass your details to any external third parties so that they can market to you too.

We understand that you may change your mind about receiving these types of emails or texts so you can ask us to stop at any time. Just follow the unsubscribe link on any marketing communication we send to you and we will promptly remove you from our database. This will only apply to data you have supplied in accordance with signing up to marketing services. Data provided for other purposes will remain in our systems in line with this policy.

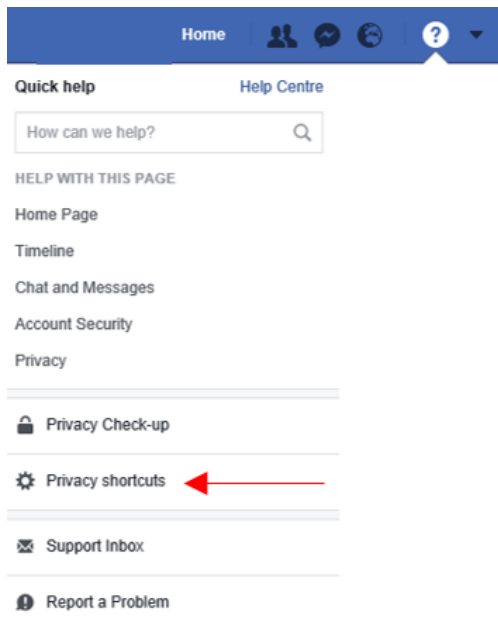
## **+Profiling and targeted marketing**

As a modern business, we utilise services that use technology in order to supply you with the best and most suitable marketing communications we can offer. This includes advertisements on third party platforms such as Facebook. This is done by using a built in Facebook Business feature called 'Custom Audiences'. We share your email address with our third party who then utilise the feature, looking at demographics and other traits like interests taken from information that you have uploaded onto Facebook in order to bring our advertisements to the people who might be interested in them most.

We don't believe that it will have a significant negative impact on you and in fact think you'd appreciate our more suitable ads, but, you can let us know if you don't want to have your data used in this way and we'd be happy to make sure that we stop. You are our priority! Contact us via any of the details at the top of the page and we'll make the required changes to our records.

More information can be found on the custom audiences feature [here](#). You can change your Facebook settings if you would like to, by visiting the quick help menu where there are a number of privacy options that you can change to meet your preferences.

To visit the privacy options for your Facebook account, click on the question mark icon on your home page and click privacy shortcuts, which will take you to a privacy options management page:



Other social media services will have similar functions which should be easy to find on their webpages.

To opt out of any online targeted marketing specifically please contact us via [DataSecurityInformation@marstons.co.uk](mailto:DataSecurityInformation@marstons.co.uk) or on 01902 711811.

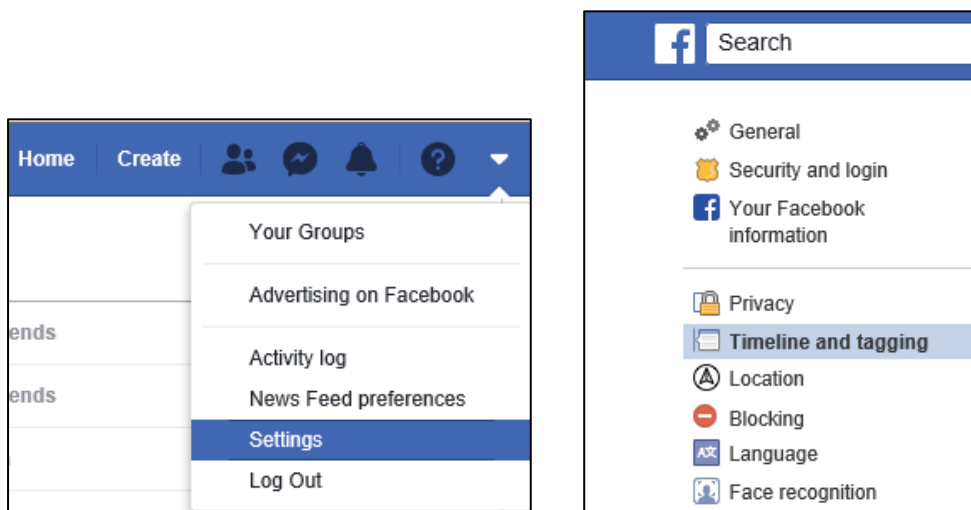
## **+Promotions & Competitions – Publication of winners**

From time to time we may offer interactive promotions and competitions via social media platforms. When you choose to take part in these activities you should be aware that on some occasions the promoting party may choose to announce the winner of the event by ‘tagging’ them in an announcement on the relevant social media platform. We have certain obligations when running competitions or similar events including publishing details about the winner however this does not extend to identifying a particular individual via this method. If you are uncomfortable with this practice you have some options in order to conserve your right to privacy.

### **1) Use the social media platforms’ settings panel**

We have used Facebook as an example here but all social media platforms should have similar functions.

Log into your account and navigate to the settings menu. Then click Timeline and Tagging in the left hand options menu.



Use the options to decide who you want to be able to tag you on your timeline and on the news feed, and even activate a review system to approve tags before they are posted publicly.

### **2) Contact us**

You have the right to contact us to ask us not to publish your details in this way (or any other way). This is known as the right to object. Whilst we may not publicise your details to the general public, we may still need to inform the Advertising Standards Authority to confirm that our promotion or competition was genuine. Please contact us at [DataSecurityInformation@Marstons.co.uk](mailto:DataSecurityInformation@Marstons.co.uk) for more information or to raise an objection.





**+On what basis do we process your data?**

The lawful basis for processing varies depending on the processing activity.

We rely on a combination of legitimate interest, consent, legal obligation and contract in order to process your personal data (a definition of each is provided within the glossary). Below we have defined the ways in which we may process your personal data and what the legal basis is for doing so, whilst outlining our legitimate interests where necessary. We may process your personal data based on multiple lawful basis where on occasion, circumstances may dictate this is necessary. Please contact us if you require further details on any of the points below where multiple basis have been specified. Generally we consider:

<b>What are we trying to achieve?</b>	<b>What personal Data is involved?</b>	<b>Our lawful basis for processing</b>
To respond to your feedback, enquiry, comment or complaint	Identity Contact	Necessary for our legitimate interests (to ensure resolution to your reason for contacting us so that business can continue in a manner you'd expect)
To fulfil your order for products or services, including where you sign up for an online account with us	Identity Contact Financial Transactional Technical	Performance of Contract
To administrate the terms of your shareholding including the processing of dividends, associated rights and benefits	Identity Contact Transactional Financial	Performance of Contract Legal Obligation
To take steps to or make you a party to a business agreement (such as a Tenant, Retailer, Lessee, Free Trade Customer or other similar arrangement)	Identity Contact Financial Transactional Marketing preferences	Performance of Contract Necessary for our legitimate interests (to conduct initial or ongoing credit reference checks, to offer you beneficial information (particularly on our current promotions), to recover outstanding monies from you)

<p>To administrate a competition, survey, or review that you are party to (and to notify you of any such changes that may affect you)</p>	<p>Identity Contact</p>	<p>Performance of contract Legal Obligation (competitions) Necessary for our legitimate interests (to action the responses to surveys or reviews to improve our products and services)</p>
<p>To conduct troubleshooting, data analysis, testing, research, system maintenance, support, reporting and hosting of data</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>Necessary for our legitimate interests (to run our business in the best possible manner, providing administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Legal obligation</p>
<p>To administrate a job application</p>	<p>Identity Contact Profile</p>	<p>Performance of Contract Legal Obligation</p>
<p>To fulfil marketing communications via email, SMS or in certain circumstances telephone</p>	<p>Identity Contact Profile Marketing and Communications</p>	<p>Consent Performance of Contract/Necessary for our legitimate interests (telephone – to provide marketing services to other businesses so that we can communicate our current offers and promotions. To improve our relationship with you and ultimately grow our business)</p>
<p>To deliver relevant website content and advertisements (including on social media websites) to you and analyse feedback so that we can measure the effectiveness of the materials  To also suggest products and services we believe you will be interested in</p>	<p>Identity Contact Profile Usage Marketing and Communications Technical</p>	<p>Necessary for our legitimate interests (to show how customers interact with our advertisements, use our products/services, so that we can improve the advertisements, our relationship with you, products and services, ultimately to improve and grow our business)</p>
<p>We do not intend our marketing materials to be received by anybody under the age of 18 due to the nature of our business. Your personal data may be used to determine whether you meet this criteria.</p>		

### **+Who might receive a copy of your personal data?**

Throughout the course of activities it may be necessary for an external third party to receive a copy of your personal data. All of our external third parties are thoroughly vetted and are subject to contractual requirements and assessment of security standards in order to become an approved supplier. They are only permitted to process your personal data for the specified purpose and not for their own benefit.

Your data may be shared with any member of our group or trading divisions but external third parties may include any of those set out in the glossary, as relative to your circumstances.

- Business Partners, suppliers and sub-contractors where they are performing a contract we have entered into with them;
- Advertising networks and support teams of this function to select and serve the relevant ads to you (particularly where we may share some of your details with a third party to enable delivery of more suitable advertisements to your social media homepage);
- Analytics and search engine providers that assist us in optimising our site;
- Website & website services hosts including payment processors;
- Credit reference agencies;
- Agencies that assist in sending our marketing, informational or news communications; and
- Authorities or organisations where there is a legal obligation for us to do so or for the prevention of fraud; and
- We may share your email address with our third party who then utilise the feature, looking at demographics and other traits like interests taken from information that you have uploaded onto Facebook in order to bring our advertisements to the people who might be interested in them most.

### **+Where is your data stored?**

Your data may be transferred to and stored at a destination outside the European Economic Area (“EEA”) where we use external third parties. It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfillment of your order, the processing of your payment details and the provision of support services (amongst other things).

We will only transfer personal data to countries where the GDPR applies or that have been deemed adequate by the ICO. Alternatively a transfer may occur where we have adequate contracts approved by the European Commission which protects personal data in the same way that it is protected in Europe. We may also transfer to external third parties where they subscribe to the EU-US Privacy Shield. We make a thorough check and have strict requirements (in line with the law) in order to approve this type of processing in consideration of our suppliers.

Any information provided to us is stored in our secure servers and any payment transaction data is encrypted using SSL technology. Where you have a password which enables access to certain parts of the website you are responsible for keeping the password confidential. Please do not share your password with anyone.

Unfortunately the transfer of information over the internet is not completely secure. We do our best to protect your personal data but we cannot guarantee the security of your data when it is transmitted to our site. Once we have received your information we will ensure that we strictly monitor procedures and security measures to keep it safe.

Our site may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies which we do not accept any responsibility or liability for. Please check these policies before you submit any personal data to these websites.

If you would like specific information about where your data is stored in relation to a particular usage of your data, please contact us.

### **+How long will we keep your data?**

We will only hold on to your personal data for as long as we need it to fulfill the purposes we collected it for. This includes considering the amount, nature and sensitivity of the data and the risk of any potential harm mishandling of this data may cause. We also consider if and when we can achieve the purposes we collected it for or if we can complete this without the personal data. We also consider legal, tax and reporting requirements that impose limitations on how long we hold the data for. It may be kept for a longer period of time if we reasonably predict there will be an element of legal action within our relationship with you.

Please contact us if you would like to find out how long and why we keep your personal data.

- Specifically in relation to targeted marketing, there is no further data held by Marston's as a result of completing this type of project. Our goal is to reach our current and prospective customers with information and offers that may be suitable for them - not to gather as much information as we can about them. We may receive anonymous statistics and trend identifications as a result of the project however. Our third party that assist us in these services delete any data within 2 weeks of the initial commencement of the project.

### **+What are your rights?**

Upon occasion, you may be entitled to certain rights under data protection law. These are laid out below but a full breakdown of their meaning is available in the glossary. You can enact any of these rights by contacting us via [DataSecurityInformation@marstons.co.uk](mailto:DataSecurityInformation@marstons.co.uk) or on 01902 711811.

- Right of Access to your personal data
- Right to rectification of your personal data
- Right to erasure of your personal data
- Right to object to processing of your personal data
- Right to restrict processing of your personal data
- Right to data portability

There is no fee applicable to any of the above, however we may charge a fee or refuse your request if it is unfounded, excessive or repetitive.

We aim to respond to valid requests within one calendar month, however in certain circumstances it could take us longer. This may be because you have submitted a number of requests or your request is particularly complex. We will keep you updated with your request along the way if this is the case.

We may need to verify your identity and ensure your rights to the personal data we hold on occasion. We will always make sure our request is reasonable and in line with the information or right you are requesting. This ensures we are not sending the data to somebody who is not entitled to see it or acting upon a rights request that has not been legitimately made by the person who is entitled to it.

### **+Changes**

We regularly review our policy so that we can ensure it is accurate and informative. Any changes will be made on this page. Please check back frequently for updates.

It is also important that any personal data we hold about you is up to date and accurate. Please update us if any of the details we hold about you change so that we can ensure our records reflect these changes.

## **+Contact**

Questions, comments and requests regarding this policy are welcomed and should be directed to any of the contact details at the top of this page.

We have appointed a Data Protection Officer for Marston's PLC who can be contacted via [DataSecurityInformation@marstons.co.uk](mailto:DataSecurityInformation@marstons.co.uk).

Alternatively, should you feel necessary, you can contact the Information Commissioner's Office on 0303 123 1113 or online [here](#).



## +COOKIE POLICY

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When you visit our websites we use cookies. Cookies allow us to identify the computer or device you're using to access our websites - but we can't identify you personally.

You can set up your web browser to refuse cookies, but this website will then fail to operate correctly.

### TYPES OF COOKIES WE USE

Here are the types of cookies our websites use and some more details about what they're used for:

Cookie Name	Purpose	Expiration Policy
analyticsOptIn	<b>Non-essential</b> Lets us know whether you're happy for us to learn more about the pages you visit, and show you relevant offers based on this.	10 years from date of acceptance.
ASP.NET_SessionId	<b>Essential</b> This cookie is used to maintain temporary information from one page to another and to enable account functions	Expires at the end of the current browser session
_ga _gat _gid __utma __utmb __utmc __utmz	<b>Non-essential</b> Collect analytical data about how visitors use our site - so that we can improve the website's experience.	The Google Analytics software is described here You can opt out of being tracked by Google Analytics across all websites here
_one _one_<various>	<b>Non-essential</b> Collect analytical data about how visitors use our site - so that we can improve and personalise the website experience. No personal data is used or stored in these cookies.	

## **+Glossary**

Some terms we use in this policy may be difficult to understand so we've provided a breakdown below to help you clarify what we mean.

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in managing and carrying out our business functions so that we can give you the highest quality services/products and the best and most secure experience. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We will not use your personal data where our interests are overridden by your fundamental rights (unless we have your consent or are required or permitted to by law). If you need further detail on how we assess our legitimate interests against any potential impact on you in relation to certain circumstances, please contact us.

**Performance of Contract** means processing your data where you are a party to a contract and we need your personal data in order to carry out that contract or to take steps at your request if you are thinking of entering into a contract with us.

**Legal obligation** means processing your personal data where we have to comply with a law that applies to us.

**Consent** means you have specifically let us know that we can process your data for the purpose already given to you.

### **EXTERNAL THIRD PARTIES**

- Website Hosts – In this instance CST Group Ltd ([cst-group.com](http://cst-group.com)) are the host of this website;
- Merchant Services providers;
- Providers of accident management systems, insurance managers and claims handlers;
- Agencies providing distribution services for marketing materials and or service information, whether electronic or in hard copy;
- Credit reference agencies;
- HMRC, regulators or other authorities as necessary;
- Providers of prizes or incentives in relation to competitions, promotions or surveys;
- Share registration and management service providers;
- IT Systems and administration services providers;
- Advisors or agencies acting on our behalf such as solicitors, auditors, insurers, registrars and collections agencies;

### **YOUR LEGAL RIGHTS**

This is a breakdown of what each of your rights mean and the results you can expect when you enact them.

- Right of Access to your personal data – This is usually called a ‘Subject Access Request’. You can request a copy of personal data to see what we hold about you and to check why & how we are processing it and that we are processing it lawfully. We may be required to suitably redact (obscure) elements of the requested detail to protect the rights and personal data of other individuals.
- Right to rectification of your personal data – If you recognise any of the personal data we hold on you to be incorrect or incomplete you can request it to be corrected. In certain circumstances, we may require proof of accuracy of any new data being submitted.
- Right to erasure of your personal data – If you believe there is no fair reason for us to hold an element of your personal data, you can ask us to remove or delete this from our records, On occasion you may want to exercise this right on a successful objection to processing (see definition below). If for any reason, for example, to comply with a legal obligation, we cannot delete your personal data we will action your request as far as possible and provide to you a reason as to why we cannot fully comply with your request.
- Right to object to processing of your personal data – If we rely on legitimate interest as our legal basis for processing or the legitimate interest of another third party, you can object to our processing if you feel it impacts your fundamental rights and freedoms. We will reassess the legitimate grounds we have for processing your data and on occasion we may demonstrate that they are sufficient in overriding your rights and freedoms. Specifically in relation to direct marketing, please see the section above entitled ‘Marketing’.
- Right to restrict processing of your personal data – You can ask us to temporarily pause the processing of your personal data in certain circumstances. For example:
  - If you have objected to our processing of your personal data, but we are assessing whether our legitimate grounds override your rights and freedoms.
  - If you want to ensure that it is correct or complete before we continue to use it.
  - If we are processing the data unlawfully but you do not want us to delete it.
  - If you ask us to keep the data where we no longer need it, as you require it to establish, exercise or defend legal claims.
- Right to data portability – This applies to automated information originally received on the lawful basis of consent or performance of contract. You can ask for a copy of the related data and for it to be transferred to a third party of your choosing in a commonly used, machine readable format.