



# **LIMA GROUP**

( Lima Fitzrovia Ltd & LIMA Floral Ltd. )

## **GENERAL DATA PROTECTION POLICY**

**May 2018**

The **General Data Protection Regulation (GDPR)** (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area. It also addresses the export of personal data outside the EU and EEA. In order to comply with this we have created the following policies in order to store and safe keep your information for communication purposes that are exclusively do with LIMA.

### **1. What information we need from you**

Our General Personal Data Protection Policy governs the use and storage of your data. You can see our General Personal Data Protection Policy (below.)

LIMA (Lima Fitzrovia Ltd. and Lima Floral Ltd.) is a “Controller” of the personal data you (the data subject) provide us. We collect the following types of personal data from you:

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- Name
- Email
- D.O.B.
- Gender
- Mobile
- Address and Postcode

### **2. Why we need this information**

We need your personal data to provide you with the following services:

- Direct marketing communications from LIMA only
- Security & safety of LIMA customers & staff
- Employment with LIMA
- Compliance with UK regulatory authorities

### **3. What we do with this information**

Your personal data is database stored with restricted IP Access and is located within the United Kingdom. No third-party entities have access to your data, unless specifically required by law.

### **4. How long we keep this information**

Under UK law, we are required to keep your employment documents for 5 years. After this period, your personal data will be irreversibly destroyed. Any personal data held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information.

## **5. Know your rights**

Should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted. If you wish to complain about how we have handled your personal data, please contact either [info@limalondon.com](mailto:info@limalondon.com) or [info@limafloral.com](mailto:info@limafloral.com). We will promptly look into your complaint and work with you to resolve the matter. If you still feel that your personal data has not been handled appropriately, you can contact the Information Commissioner's Office <https://ico.org.uk/>.

## **General Data Protection Policy**

### **1. Scope**

For the purposes of data protection law, the “Controller” is Lima Fitzrovia Ltd. – OR – Lima Floral Ltd. Our companies are incorporated in England and Wales and have registered addresses in 31 Rathbone Place (W1T-1JH) and 14 Garrick Street (WC2E-9BJ) respectively. We are responsible for, and control the processing of, some of your personal data.

This policy sets the required retention periods for specified categories of personal data and sets out the minimum standards to be applied when destroying certain information. This Policy applies to all business units other business relationships with third parties. This Policy applies to all Company officers, directors, employees, agents, affiliates, contractors, consultants, advisors or service providers that may collect, process, or have access to data (including personal data and / or sensitive personal data). **We use selected third parties (OpenTable, Propeller, etc.) to store some of this information and these entities are individually responsible for making their own GDPR compliance checks and for their adherence to it.** This policy applies to all information used at the Company.

#### **1.1 Lawful Basis**

In order to process personal data, we must have a lawful reason (sometimes called a lawful basis). We always ensure that this is the case, and we set out our lawful bases below.

#### **1.2 Contractual Necessity**

If you are our customer or applying for a job, we will process your personal data for the following purposes, on the legal basis that it is necessary for us to provide our products and services to you:

- to identify you;
- to respond to your enquiries;
- to allow you to register an account;
- to provide our products and services;
- to carry out billing and administration activities, including refunds and providing, gift cards, etc;
- to evaluate job applications and take any next steps

#### **1.3 Legitimate Interests**

We process your personal information for our legitimate business purposes, which include the following:

- to conduct and manage our business;
- to enable us to carry out our services;
- to ensure our website and systems are secure;
- to personalize the web experience;
- to analyze, improve and update our services;
- to deal with complaints;
- to detect and prevent fraud;
- to let customers know about our products, services, promotions or events that we consider may be of interest to them.

#### **1.4 Compliance with laws**

We may process your personal data in order to comply with applicable laws (for example, if we are required to co-operate with an investigation pursuant to a court order).

## **2. Data Collection, Utilization and Disposal**

### **2.1 Data Collection**

We may collect personal information about you when you use our online services or visit one of our restaurants. For example (but not limited to), when you :

- purchase items at our restaurants;
- register to receive emails relating to our products, services, offers, competitions and events;
- connect to our Wi-Fi;
- contact us.

The types of personal information we may collect include :

- your personal details such as name, e-mail address, postal address, phone number, date of birth, gender, etc.
- information about your use of a discount or offer etc.
- other personal information you provide us with.

### **2.2 Information collected from other sources**

We may obtain information about you from third parties and other sources. For example, if you use a gift card, we may receive information from the

relevant provider we use concerning how much top-up was put on the card, and how much was spent on each transaction, among other information. This is shown as an example as to how we may lawfully obtain information about you from third parties. Any information we do receive will be used lawfully.

### **2.3 Retention General Principle**

For any document the required retention period for such document will be deemed to be 5 years from the date of creation of the document. We consider the personal data that we store, applying reasonable criteria, and we will not keep information for longer than is necessary.

### **2.4 Data Utilization**

We may use your personal information to :

- fulfil your requests or orders and process payments for our services;
- communicate with you about our products and services (including gift cards);
- administer your participation in contests, competitions, prize draws, offers, promotions or special events;
- send you marketing emails (where we are permitted to);
- deliver content (including advertising);
- respond to questions that you ask us, or complaints or concerns that you raise with us;
- personalize your experience on our Website and in-restaurant technologies, such as providing you with content in which you may be interested, and making navigation on our Website easier;
- perform data analytics, including consumer research, trend analysis, and financial analysis;
- operate, evaluate and improve our business, including the development of new products and services; determination of the effectiveness of our sales, marketing and advertising efforts; and analysis and improvement of our products, offers, promotions, and other technologies;
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with our obligations under applicable law.

We may also process your location information collected through automated means to :

- personalize the visitor experience in our restaurants or on our website;
- deliver content (including advertising) tailored to our users' interest;
- help diagnose technical and service problems;
- identify a device for fraud prevention purposes;

- gather demographic information about our users.

## **2.5 Destruction of Data**

The Company and its employees should therefore, on a regular basis, review all data, whether held electronically on their device or on paper, to decide whether to destroy or delete any data once the purpose for which those documents were created is no longer relevant.

Once the decision is made to dispose of data, it should be deleted, shredded or otherwise destroyed to a degree equivalent to their value to others and their level of confidentiality. Appropriate controls shall be in place that prevent the permanent loss of essential information of the company as a result of malicious or unintentional destruction of information.

## **3. Compliance**

Failure to comply with this Policy may result in adverse consequences, including, but not limited to, loss of customer confidence, litigation and loss of competitive advantage, financial loss and damage to the Company's reputation, personal injury, harm or loss.

Non-compliance with this Policy by permanent, temporary or contract employees, or any third parties, who have been granted access to Company premises or information, may therefore result in disciplinary proceedings or termination of their employment or contract. Such non-compliance may also lead to legal action against the parties involved in such activities.

## **4. Document Disposal**

Level I documents are those that contain information that is of the highest security and confidentiality and those that include any personal data. These documents shall be disposed of and shall be subject to secure electronic deletion.

Level II documents are proprietary documents that contain confidential information such as parties' names, signatures and addresses, or which could be used by third parties to commit fraud, but which do not contain any personal data. These documents shall be disposed of and shall be subject to secure electronic deletion.

## **5. Sharing your personal information**

We may provide your personal information to the following recipients for the purposes set out in this Notice:

- other companies within our group;
- franchisees;
- our employees, consultants, agents and service providers, in each case where it is relevant to do so;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity.

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In addition, you may choose to post information about, or interact with, us on social media platforms, for example Facebook, Twitter and Instagram.

## **6. Marketing**

We may store your contact details, and carry out marketing profiling activities, for direct marketing purposes. If you have given your consent, or if we are otherwise permitted to do so, we may contact you about our products or services that may be of interest to you. If you prefer not to receive any direct marketing communications we will give you the option to opt out each time we send a marketing communication by electronic means.