

Privacy Policy – Corporate Contacts

IDENTITY & CONTACT DETAILS OF THE CONTROLLER & THE DATA PROTECTION OFFICER

State Bidco Limited is the fast growing owner of the UK's three leading discount dining clubs, tastecard (Taste Marketing Limited), Gourmet Society (Simard Limited) and Hi-Life (Hi-Life Diners Club Limited) as well as Ello Media. State Bidco Limited are committed to protecting and respecting your privacy whilst remaining compliant with The General Data Protection Regulation (EU GDPR) and the Data Protection Act (DPA). In order for us to drive compliance, we have a Personal Information Management System which is compliant with BS 10012:2017.

State Bidco are the Data Controller and have an appointed Data Protection Officer whom can be contacted via email using the below details. For those who are based in the EU you can contact our EU representative whose details are below.

PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING

In order for State Bidco to fulfil its contractual and customer obligations, there is a requirement to collect specific personally identifiable information relating to our customers. There are a couple of legal bases for the processing of such personally identifiable information. If you sign up on our website or one of our landing pages, then personal information is processed on the basis that we have a legitimate interest in doing so.

For marketing communications, we use the legitimate interest of provide marketing communications. However, you will always have the option of unsubscribing from these emails.

If you decide to do business with State Bidco (or a member of their group) then our lawful process of processing data will be for the fulfilment of a contract with yourself.

LEGITIMATE INTERESTS OF STATE BIDCO OR THIRD PARTY

State Bidco have a legitimate interest in further processing the information which is provided by customers at the point of sale for marketing purposes.

We may also use your information for other specific legitimate purposes such as:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, business opportunities or services which we feel may interest you, where we believe you have a legitimate interest in.
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.

We may also use your data to provide you with information about services which may be of interest to you and we may contact you about these by post or telephone or other electronic means (including email). We do not sell, rent or lease customer lists to third parties. We may, from time to time, contact

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you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on one of our sites such as;
 - **Name, business address and postcode** – So that we can contact you in writing and send correspondence in writing. If you are a restaurant we will use the address of the business to let members know where your restaurant is.
 - **Email address** – We send communications via email and will send you informational messages as well as services which may interest you.
 - **Telephone numbers** – If there are any problems or we need speak with you , we need to be able to contact you quickly.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our site and the resources that you access.

RECIPIENTS OF THE PERSONAL DATA

State Bidco are required to transfer the personal information provided by its customers to third parties in order to fulfil contractual obligations. The following are categories of recipients that customer information could be transferred to:

- Data Centres – This is so we can store your data securely
- Fulfilment Houses – To allow us to fulfil and send you a physical card if you have ordered one.
- External IT Providers – To provide disaster recovery and back up services.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We may disclose your personal information to any member of our group (State Bidco Limited), which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will not disclose your information to any of the relevant third parties listed above for marketing purposes.

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Our Data Protection Officer can provide you with contact details of our third parties upon request if required. You are able to do this by contacting us using the details in the '**Contact**' section.

DETAILS OF TRANSFERS TO THIRD COUNTRIES & SAFEGUARDS

State Bidco has an information system that requires them to transfer personally identifiable information to a third party located in a third country, e.g. USA, controls are in place to ensure that the level of protection is not undermined and that security controls are at a level to commensurate with the type of information being transferred. This is applicable to the email ticketing system.

We also use an external IT service provider to assist us with the management of our IT systems and ensuring that our systems are secure. We do not transfer data to this organisation however they will have access to our systems to enable them to complete maintenance and IT support.

You can get an explanation of our safeguards by contacting us using the details in the '**Contact**' section.

RETENTION PERIOD

State Bidco retain all personal information for 5 years after you last interacted with us. Where there has been a period of 5 years after the end of our business relationship where there has been no interaction between the organisation and the customer within this time, their information is erased and securely disposed of.

RIGHTS OF DATA SUBJECTS

As a Data Subject (individual) which State Bidco process information on behalf of, you have the right to withdraw consent from our marketing at any given time. You can exercise the right at any time by contacting us using the details in the '**Contact**' section. However, we will still be required to notify you of changes to the privacy policy, terms and conditions and any other legal requirement.

You have the right to make a Subject Access Request to State Bidco's Data Protection Officer in the event that you wish to determine what information we hold on you. We welcome these requests and aim to respond within 72 working hours of receipt.

You have the right to request your data to be erased. This can be done by contacting us on the below email addresses. Please bear in mind this is not an absolute right and there may be instances where we cannot completely erase your data (e.g. When the personal data is required for the exercise of legal claims), if an exception does come up this will be discussed with you when you make the request.

You have the right to rectification. If you notice that any of your details are incorrect please contact the customer service team who will be more than happy to rectify this. We will also send transactional reminders to request that you notify us of any changes to your personal data so that we can keep your data up to date.

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You have the right to portability. This is where you would like to transfer your data to another organisation. To request this, please contact us on the below email addresses. We will provide this within a structured CSV file for you to provide to a third party.

You also have a right to lodge a complaint with the Supervisory Authority (Information Commissioners Office in the UK, Data Protection Commission for EU and Republic of Ireland), should you feel that we have not handled your information in line with legislative and regulatory requirements.

Our site may, from time to time, 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 and that we do not accept any responsibility or liability for these policies.

AUTOMATED DECISION MAKING, INCLUDING PROFILING & INFORMATION ABOUT HOW DECISIONS ARE MADE, THE SIGNIFICANCE OF THE CONSEQUENCES

We do not do any automated decision making on you as a business partner. Nor do we profile you as a data subject.

IP ADDRESSES

We may collect information about your computer, including where available your IP address, geographic location (if you allow when prompted by your browser), operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns.

COOKIES

To enable our systems to recognise your device and to provide features to you, we use cookies. For more information about cookies and how we use them, please read our [Cookie Policy](#).

MARKETING COMMUNICATIONS

We regularly send out email communication to keep you up to date with all the latest offerings from the State Bidco brands and our chosen partners. If you wish to unsubscribe from these emails you can do so at any time by simply clicking either of the links in the header or footer and you will be removed from all promotional emails. Please note that even if you decide not to subscribe to, or to unsubscribe, from promotional email messages, we may still need to contact you with important transactional information related to your account and your purchases. For example, even if you have unsubscribed from our promotional email messages, we will still send you confirmations when we provide updates to the privacy policy.

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CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time.

If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will make that clear on our websites or by email, so that you are able to review the changes.

In the event that you wish to alter your Privacy settings or opt-out, you are able to do this by contacting us using the details in the '**Contact**' section

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should either be emailed to DPO@diningclubgroup.co.uk or addressed to the Data Protection Officer, State Bidco Limited, Birkby Grange, 85 Birkby Hall Road, Birkby, Huddersfield, HD2 2XB.

If you are a resident of EU (excluding the UK) please contact GRCI Law. We have appointed GRCI Law to act as our EU Representative in the event of the UK's departure from the European Union. All requests, questions and comments should either be emailed to grcilaw@grcilaw.com or addressed to c/o Head of Data Privacy Manager Service for GRCI Law, IT Governance Europe, Third Floor, The Boyne Tower, Bull Ring, Lagavooren, Drogheda, Co. Louth, A92 F682