



Your Privacy

Pennyblacks takes the privacy of our customers information very seriously. With that in mind, we have produced and adhere to a detailed privacy policy in line with the General Data Protection Regulation (GDPR) - a regulation in UK and EU law on data protection and privacy for individuals within the UK and EU.

Our Privacy Policy details what personal information we hold about you, what we use the data for, how we store your personal information, how we share data, transaction and data security, your right to access, amend and delete your data.

We have prepared a detailed policy so that you can make an informed decision about the extent you provide your information to us. Please do not use our site if you do not agree with the Privacy Policy.

In summary:

- We will take reasonable steps to protect the security of the Personal Information we collect from you.
- We will not disclose your Personal Information to third parties except as described in this policy.
- We will allow you to view, correct or remove your Personal Information and other information that we have collected.
- We will not keep your personal data on file for any longer than is legally required or a term you agree to.
- We will not send you details of our exclusive offers, event and news unless you "opt in" to our mailing list.

Privacy Policy

Pennyblacks takes the privacy of customers and their information very seriously. This policy explains how we use any personal information we collect about you, your rights to access and correct the personal information we hold about you.

For the purpose of this document, "Pennyblacks" will refer to Pennyblacks (part of Crophorne Inns Limited) and "you" the user of the Pennyblacks website and services and facilities, that is 16 years old or older and capable of entering a contract.

By consenting (opting in) and agreeing to provide Pennyblacks with your personal information "Data" (as defined below), whether through the website or in person, you consent, agree and accept that Pennyblacks as well as respective representatives and/or third-party agents may collect, use, disclose and share your personal data as described in this Privacy Policy.

By continuing to use the website or services you are confirming that you accept this Privacy Policy and Terms and Conditions. If you do not accept this Privacy Policy or Terms and Conditions, you must leave the Website and cease using Pennyblacks' services immediately.

1.0. What personal information do we collect about you?

Pennyblacks collect personal data from you when you make an enquiry either in person, over the phone, or online.

Pennyblacks also collect data from you when you subscribe to marketing communications and connect using social media websites. These may be carried out online, by telephone or in person.

Without limitation, any of the following personal data may be collected:

- Your full name
- Contact information such as email address, landline and/or mobile telephone numbers
- Home address and postcode
- Your credit or debit card details if you are making a payment
- The month of your birthday
- Your special dietary requirements and allergies
- Your IP address
- Your web browser type and version
- Your operating system
- A list of URLs starting with your referring site, activity on our website, and the website you exit to
- Your cookie information

If you provide Pennyblacks with any personal Data relating to any third party (e.g. information about your spouse, companion, employees or colleagues) for particular purposes, by submitting such information, you do so at your own risk having obtained the consent of such third party to provide Pennyblacks with their personal Data for the respective purposes.

We never knowingly collect data from anyone under the age of 16.

2.0 What do we use your Data for?

Pennyblacks use the information collected about you to:

- Reply to your questions and enquiries
- Respond to your feedback
- Keep you updated on latest news, offers and events (see 2.1)
- Monitor the Pennyblacks website and email performance using Cookies (see 2.2)

2.1. Marketing

Pennyblacks will only contact you via marketing channels (email, phone or post) with news and offers if you have given your consent by "opting in" to marketing communications. Consent can be given by, but not limited to, signing up to the newsletter on the website or ticking the box to give your permission whilst making an enquiry. Marketing communications are generally sent by email and include news, offers and events.

You can stop marketing communications at any time by clicking the "UNSUBSCRIBE" link at the bottom of each marketing email. Alternatively, you can email info@penny-blacks.com to request manual deletion from the mailing list, typing "UNSUBSCRIBE" in the subject line.

Please note that as a result of operational requirements, Pennyblacks may still be required to contact you from time to time regarding any past, present or future enquiries that you have made.

2.1.1 Social Media

If you choose to connect with Pennyblacks via social media websites, such as Facebook, Twitter or Instagram, we may collect your username (which may contain your name and surname) by you "liking" or "following" Pennyblacks. We may also occasionally run competitions via these social media websites – some of which may direct you to a separate competition page on a third-party website such as Wufoo. Please ensure you study their privacy policy before continuing.

Please note that by connecting with Pennyblacks via social media websites you are bound by their own Terms and Conditions and Privacy Policies.

2.2. Cookies

Pennyblacks may set and access cookies on your 'computer' (meaning any computer, laptop, tablet, mobile, or other device that the website can be viewed on.)

A 'cookie' is a small file of letters and numbers which asks permissions from your browser to be placed on your Computer's hard drive. Cookies allow web applications to respond to you as an individual and allow us to distinguish you from other users on the website. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences and allows Pennyblacks to continually improve the website.

Cookies do not take up much space (unless you have thousands of them) and cannot contain viruses or other harmful code.

Pennyblacks use cookies including but not limited to:

- Google Analytics Cookies to identify which pages are being used. This helps us analyse data about web page traffic (the number of visitors and how visitors move around the Pennyblacks Website when they are using it) and improve the Website in order to tailor it to your needs.
- Third party Cookies within Pennyblacks' email campaigns, predominantly sent using third party email marketing tools, as well as Google Analytics. Cookies are used to monitor open rates and improve your experience and also for the tracking of website activity initiated from hyperlinks within email marketing campaigns.
- Session Cookies. These are temporary Cookies on our website which only exist in the period you access the it (or more specifically, until you close the browser after accessing the Website). Session Cookies help the Website remember what you chose on the previous page, therefore avoiding having to re-enter information.

The length of time a Cookie will remain on your Computer will depend on the type of Cookie. On the Pennyblacks Website, these Cookies do not contain personal information, and cannot be used to identify you. To find out more about how to manage cookies through your chosen browser go to: www.allaboutcookies.org/manage-cookies/

You may delete/disable your Cookies or manage your Cookies preferences but if you do decide to disable or delete the Cookies altogether please note that the Pennyblacks Website may not work as well as it could.

You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies; however, this can be altered. For further details please consult the help menu in your browser on your Computer and search for "cookies".

3.0 How do we look after your Personal Data?

To ensure that your data is treated with the highest regard and compliant with legal requirements, it is The Pennyblacks' company policy to:

- Ensure all relevant employees have received training in how to correctly handle Data. Training includes educating employees in the importance of the safe and secure handling of Data, and the procedures in place to ensure all Data is handled in this way.
 - Anonymise all data collected for third-party clients
 - Evaluate the Pennyblacks database every 12 months and securely delete any contacts that are no longer engaged.
 - Always adhere to the internal procedures and measures in place to keep any personal Data held safe and secure.
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4.0 How do we store your personal information?

To ensure your data is stored safe and legally Pennyblacks use the following trusted third-party agents:

Content Management System (CMS)

Pennyblacks use the 'Wordpress' CMS to manage the website (<http://pennyblacksbar.com>)

Email Marketing Application

Pennyblacks use the 'Campaign Monitor' application for all email marketing activity.

The Website CMS and Email Marketing Application are services supplied and managed by Journey (trading name of The Hotel Marketing Group Limited). Please review their Privacy Policy.

In addition to the Data collected via the website, there are some occasions where Pennyblacks must collect data in person. This information is filed securely at all times with restricted access to keys and passwords.

5.0 Data Sharing

Pennyblacks will never sell your data to a third party for marketing purposes.

If required or deemed necessary, Pennyblacks may on occasions share your data with other organisations in the following way/s:

5.1. To facilitate services and offers

Where contracted and trusted third parties are used to facilitate services and offers, Pennyblacks will share your Data with those parties for that purpose, and that purpose only. This includes the processing and delivery of marketing communications, and any other third-party services engaged to perform payment, business support, operational or administrative function. Third parties are subject to confidentiality obligations. (See 4.0)

5.2. Legal requirement

Pennyblacks may also disclose Personal Data as permitted or required by law. For instance, if asked by the police, your personal Data may be shared with them for the purposes of prevention and detection of crime.

6.0 Transaction and Data Security

Pennyblacks are committed to protecting the confidentiality and security of the information that you provide to us. To do this, technical, physical and organizational security measures are put in place to protect against any unauthorized access, disclosure, damage or loss of your information. The collection, transmission and storage of information can never be guaranteed to be completely secure, however, we take steps to ensure that appropriate security safeguards are in place to protect your information.

7.0 Accessing and amending your Data

You have a right to access a copy of the Data that Pennyblacks hold about you. If you would like to do this, please write to Pennyblacks at the address at the bottom of this document and enclose a stamped self-addressed envelope. The following details are also required in order to verify your identity before Pennyblacks can release the data:

- Full name
- Address
- Email address
- Telephone number

Upon receipt of your written request and all the details above, Pennyblacks will provide the Data within thirty (30) days.

Pennyblacks want to make sure that your personal Data is kept accurate and up-to-date so you may need to modify or update your Data if your circumstances change. You are able to make amendments by contacting Pennyblacks via email at info@penny-blacks.com with "UPDATE" in the subject line.

8.0 Retention of your Data

Your personal Data will be retained for as long as it is necessary to fulfil the purpose for which it is collected; for business or legal purposes, or in accordance with applicable laws.

As part of Pennyblacks Google Analytics tracking, user-level data and event-level data associated with cookies, user-identifiers (e.g., User-ID) and advertising identifiers are collected for the purpose of monitoring the performance of the website. This data is retained within Google Analytics for 38 months before being automatically deleted.

9.0. Deleting your Data

You have a right to withdraw your consent of use. If you wish for your entire data records to be deleted, please email: info@penny-blacks.com with "DELETION" in the subject line.

Pennyblacks can only delete your data in accordance with applicable laws and once any contractual obligations have concluded, including payment for previous contractual obligations.

10.0 CCTV

Pennyblacks has CCTV installed for the purposes of prevention and detection of crime and monitoring of staff. The images captured on the CCTV system are overwritten on a rolling 30-day basis.

Only senior appointed staff within the organisation have access to replay the CCTV footage, which is password protected.

Pennyblacks may disclose CCTV footage as permitted or required by law. For example, footage may be shared with the Police if requested for the purposes of prevention and detection of crime.

11.0 WiFi

If you choose to use the complimentary WiFi at Pennyblacks, you will automatically be diverted to the website once logged on, which uses cookies (see 2.2).

12.0 Phishing

Phishing is the practice of tricking someone into giving confidential information. Examples include falsely claiming to be a legitimate company when sending an e-mail to a user in an attempt to get the user to send private information that will be used for criminal activities such as identity theft and fraud.

Pennyblacks will never ask you to confirm any account or credit card details via email. If you receive an email claiming to be from Pennyblacks asking you to do so, please ignore it and do not respond. If you are unsure whether an email is legitimate, please forward it to info@penny-blacks.com with your message and the subject line "FRAUD". Pennyblacks will then reply to advise you on the situation.

Pennyblacks will on occasion take bookings over the phone. On these occasions, employees will state their name and the company name. If you are anxious about the phone call, revealing your payment details or do not believe that the person on the other end of the phone is an employee of Pennyblacks, please put the phone down and ring the bar directly asking for the person you spoke to. Telephone numbers are available on the website.

13.0 Links to other websites

This Privacy Policy applies solely to Data collected by Pennyblacks. Pennyblacks website (<http://pennyblacksbar.com>) may contain links to external sites, operated by other owners and third-party agents, over which Pennyblacks have no control. For this reason, we encourage our visitors to be aware when they leave the Website to read applicable privacy policies. Any access to such other websites or pages is entirely at your own risk. Pennyblacks is not responsible for the privacy policies, content or security of any third-party websites linked to the Pennyblacks website.

14.0 Changes to the Pennyblacks Privacy Policy

This Privacy Policy is regularly reviewed. Following any changes, the new version of the policy will be uploaded to the Pennyblacks website and the old version removed. Please check back frequently to see any updates. This was updated last in May 2018.

15.0 Any Questions?

Should you have any questions regarding this Privacy Policy please contact Pennyblacks using the details below:

Email: info@penny-blacks.com

Address:

Croptorne Inns,
Orchard House,
Crab Apple Way,
Vale Business Park,
Evesham,
WR11 1GE.

Phone: 0121 634 3749