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## PRIVACY POLICY

We value and respect the privacy of all our customers. This policy set out the data processing practices carried out by us through the use of our database and ensures we meet all the requirements of the EU General Data Protection Regulation (“GDPR”) when contacting you. If you have any requests regarding your personal information or any concerns regarding how we process your data please contact us at [hr@metrorest.com](mailto:hr@metrorest.com).

### Privacy Notice

This Privacy Notice outlines the types of personal data we may collect about you when you interact with us. It also explains how we store, handle and protect your data, and to ensure that you, as a customer of any of our restaurants, are fully informed of your rights.

The sections outlined below should answer any questions you may have. However if you do have further queries, then please do contact us at:

Metropolitan Restaurants  
Golden Cross House  
8 Duncannon Street  
London WC2N 4JF  
United Kingdom  
[hr@metrorest.com](mailto:hr@metrorest.com)

+44 (0)20 7484 5213

### Who is Metropolitan Restaurants?

We are the Metropolitan Restaurant Group which consists of Metropolitan Restaurant Limited, its subsidiaries and associated companies (which operate our other businesses and which are listed below). In this Privacy Notice they are all together referred to as the “Group”.

- Metropolitan Restaurants Limited Limited (Company number: 03628574) t/a Zia Teresa, 6 Hans Road, SW3 1RX
- MRL (Haymarket) Limited (Company No: 02068321) t/a Assagetti, 160 71 Haymarket, London SW1Y 4RW
- Getti Limited (Company No: 11020627) t/a La Brasseria, 42 Marylebone High St, London. W1U 5HD & Getti, 16-17 Jermyn St, London, SW1Y 6LT

This privacy notice is issued on behalf of the Metropolitan Restaurants Group (including Getti Limited) so when we mention Metropolitan Restaurants, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company or companies in the Metropolitan Restaurant Group which is/are responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us.

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## **What personal data do we process?**

We process personal data of our customers or visitors to our websites for a number of different purposes, which are explained below.

“Personal data”, or “personal information”, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

### **Restaurant Reservations**

The following personal information is required in order for us to make a reservation at our restaurants:

- Booking Name
- Telephone Number or Email Address

In order to provide exceptional customer service and to improve your dining experience, we may also collect and process additional personal information, including the following:

- Special occasions – birthdays (excluding year of birth), anniversaries and that of your guest(s)
- Seating preferences
- Allergies or food intolerances
- Food & beverage preferences
- Personal connections to other customers or staff
- General preferences
- Previous booking history
- Any publicly available information – ie job title, company where you work, name of spouse, photograph
- Encrypted credit card information
- Mobility requirements

For online reservations at our restaurants, we use the third party booking engine ResDiary and you will be directed to the [ResDiary](#) when making a booking online. In order to provide the online booking service, your personal data will be collected, transferred to and processed by Res Diary, who are located in Scotland (UK) as a data processor acting on behalf of Metropolitan Restaurants. All data collected by Resdiary is stored securely in data centres managed by [Rackspace](#) in the UK. Please refer to the section below “Who do we share your data with?” for more information.

### **e-Commerce and Retail**

The following personal information is collected and processed by us in order to provide e-commerce services to you

- Name
- Postal address and billing/delivery addresses (if different)

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- Telephone number
- Email address
- Credit/Debit Card details
- Name of recipient (if a gift)
- Delivery address, telephone number and email address of recipient (if a gift and if applicable)

This personal information may be shared with trusted third parties as data processors in order to carry out any necessary services for us, including shipping, fulfilment, and personalisation for a given order transaction. Please refer to the section below “Who do we share your data with?” for more information.

### **How do we capture your personal data?**

Reservations, bookings and orders at any of our restaurants can be made in the following ways:

- Online
- Phone
- Email
- In person
- Via a third party (person or company), such as a booking agency
- Through social media – if you choose to interact with us

Personal data which is collected is then stored by us and processed in the corresponding business system in order for us to be able to provide the relevant goods and services to you.

We may also use collect and process publicly available information that we believe could be relevant to your reservations, bookings, orders or other interactions with us. We typically search engines like Google or Social Media (eg LinkedIn) to collect this information. In these circumstances, your Personal Information may be said to have been passively collected (that is, gathered without you actively providing the information).

We do not knowingly collect personal information from children under age 13. If we learn that we have collected personal information from a child under age 13 without parental consent, we will take steps to delete that personal information as soon as possible.

### **What is your personal data used for?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (please refer to the “Business Services” section below for more information).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (please refer to the “Marketing and Communications” section below for more information).

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- Where we need to comply with a legal or regulatory obligation.

### **Business services**

We use the personal data you have provided us in order to:

- Confirm bookings, appointments and/or orders you have placed
- Amend bookings, appointments and/or orders you have placed
- Cancel bookings, appointments and/or orders you have placed
- Tailor-make to your exact requirements bookings, appointments and/or orders you have placed
- Communicate with you in regards to future or past bookings and/or orders you have placed
- Provide exceptional customer service and to improve you and your guests' experiences at our restaurants, spas and hotels.

The data that we capture for these purposes ensures that we can provide the best possible customer service and experiences. We use personal information so that our employees familiarise themselves with and look after you and your guests. The data you provide allows us to ensure that this can be achieved in the best possible way.

### **Marketing and communications**

As our customer, at the time of making a reservation or order, we would like to send you marketing communications from time to time to inform you about our restaurants, offers and products; including new openings, developments, events and partnerships, and other services we think may be of interest to you, in the form of email newsletters.

You may opt out of these marketing communications at the point the information is collected by us, in the form of an email sign up, via our website or in person in one of our locations.

You may also unsubscribe to these marketing communications from us at any time by clicking on the unsubscribe link which will be made available to you in each communication, or by emailing us at any time at [marketing@metrorest.com](mailto:marketing@metrorest.com).

Where we need to collect personal data by law, or under the terms of a contract we have with you and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **Who do we share your data with?**

#### **External Third Parties**

We work with a number of trusted and contracted third parties in order to be able to provide our goods and services to you. These third parties include (but are not limited to)

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those who provide services to us for the delivery of goods, restaurant and business systems providers.

**We do not share or sell your data to third parties for marketing purposes or for any purposes other than those explained in this Privacy Notice, without your prior consent.**

**We do not purchase personal data from third parties.**

We may transfer your personal data to the following third parties, who we have contracts with, for them to process your data as our data processors:

- Access Industries Inc t/a Procure Wizard – a hospitality management solution service which helps us procure from our suppliers. [<https://www.procurewizard.com/terms-of-use/>]
- Backbone (UK) Limited – a technology solutions provider we use to assist with any technological issues and to set up our IT infrastructure [[https://www.backbone.uk.com/about/Backbone%20\(UK\)%20Limited%20-%20Data%20Privacy%20Notice.pdf](https://www.backbone.uk.com/about/Backbone%20(UK)%20Limited%20-%20Data%20Privacy%20Notice.pdf)]
- HM Revenue & Customs, regulators and other authorities, acting as processors or joint controllers, based in the UK
- Kettle and Keyboard Ltd t/a Rotacloud – a rota management system used to clock in and clock out employees. Rotacloud are located in UK [<https://rotacloud.com/privacy/>]
- Lightspeed POS inc – a point of sale that enables us to process your restaurant orders, create menus and build data to drive our menu engineering process. Lightspeed is located in US [[https://www.lightspeedhq.com/pdf/privacy-policies/LIGHTSPEED\\_PRIVACY\\_POLICY\\_English\\_USA.pdf](https://www.lightspeedhq.com/pdf/privacy-policies/LIGHTSPEED_PRIVACY_POLICY_English_USA.pdf)]
- The Rocket Science Group t/a Mailchimp – a US company which helps us distribute our communications to our customer database [<https://mailchimp.com/legal/privacy/>]
- Professional advisers – acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in the UK who provide [consultancy, banking, legal, insurance and accounting services].
- Resdiary Ltd – an online reservations company located in UK that enables us to take, confirm and manage restaurant bookings. [<https://sales.resdiary.com/privacy-statement/>]
- Sage Group Plc and SagePay Europe Ltd – Online payment processing for internet businesses located in the UK [<https://www.sagepay.co.uk/policies/privacy-policy>]
- Tenzo Limited – an artificial intelligence platform which provides sales, forecasting, social and employee data to drive decision making. Tenzo is a UK company. [<https://www.getenzo.com/legal/privacy/>]
- Wix – a website design platform which we use to build our websites. [<https://www.wix.com/about/privacy>]

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your

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personal data for their own purposes and only permit them to process your data for specified purposes and in accordance with our instructions.

Some of our external service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

In the event of merger, acquisition, or any sale of some or all of our businesses or assets, personal information held by us about our customers will be among the assets shared with and transferred to the buyer or merged business. If a change happens to our business, then the buyer or merged business may use your personal data in the same way as set out in this Privacy Notice.

### **How do we protect your personal data?**

The security of your data is equally as important to us as it is to you. With this in mind we will treat your data with the utmost care and take all necessary steps to protect it.

Our websites use encrypted 'https' technology and access to your personal data is password protected, and sensitive data (such as payment card information) is secured by SSL encryption and tokenisation.

We carry out vulnerabilities assessments and penetration testing to identify ways to further strengthen our information security.

### **How long do we keep your personal data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data (see the section "Your Rights" below for further information) and in some circumstances we may anonymise your personal

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data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **Your rights as a customer of Metropolitan Restaurants**

### **Right of access**

You may request access to the data we hold on you, which is usually free of charge. We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **Right to rectification**

You may have your data corrected if it is incomplete or incorrect. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Right to restrict processing**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

You may also unsubscribe from our marketing communications at any point, should you no longer wish to receive these. Each communication will include link to unsubscribe from further marketing communications.

### **Right to withdraw your consent to processing**

You may withdraw your consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **Right to object to processing**

You may object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

## **Right to erasure**

You may request to have your data removed from our systems. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

## **Other rights**

You may request the transfer of your personal data to you or to a third party. We will provide to you (or the third party you have chosen) your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Are you a potential, current or former employee?**

The following personal information is collected and processed in order to find you a suitable role:

- Name
- Curriculum vitae
- Photograph

The personal information above may be used in the following ways:

- To match your skill sets with job vacancies
- To keep you informed of available opportunities as they arise

The above information is used to find suitable work within our group, whether on a temporary or permanent basis, based on your requirements as set out below.

Information processed by us in respect to individuals that have worked for us previously, or who may work for us, is as follows:

- Passport

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- In some cases, permits and visas
- DOB
- National insurance number
- Full details of job offers and placements
- Outcome of criminal record checks and security clearance for certain roles
- In certain cases, medical information
- References
- Financial information (including but not limited to payroll details and terms, HMRC data, pension scheme details, court orders and statutory payments)
- A log of our communications with you by email

This information will have been provided, or will be provided, by you or a third party who we work with, such as a Job Board Company or another employment business or agency. In the case of references, these will be from your previous employer. Medical information may be supplied by a third party such as your GP, Consultant or Occupational Health. The outcome of criminal record checks and security clearance checks, where relevant, will be supplied by the Disclosure and Barring Service or other external company applicable to the placement.

**We may use this information in the following ways:**

- To establish that you have the right to work
- To undertake relevant security and criminal record checks as required by our clients and prospective employers and as permitted by law
- To deal with any medical and health and safety issues relating to certain positions
- To put in place contractual arrangements and documentation once a role has been secured
- To pay you if placed
- To enable us to provide feedback on applications if requested and to comply with legislation, interview notes and registration forms will be retained and stored securely for a period of no greater than 6 months
- Copies of passports/proof of eligibility will be kept for up to 3 years after the employee leaves the business
- As part of the recruitment process and where it may increase your chances of securing a role, your data may be shared within internal departments and across our group of companies
- If you have applied via email or through our website, your data may be retained for a period of up to 6 months, enabling us to make candidates aware of potentially suitable vacancies during this time
- Employees may be photographed or filmed working on any of our premises and we reserve the right to use these images in video and photograph.

**Legal obligations beyond GDPR**

There may be certain circumstances in which we have a legal obligation, above and beyond the General Data Protection Regulation (GDPR), to control your data and share it with the

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police or relevant regulatory, government or legal enforcement bodies. These circumstances include:

- Situations where we expand, reduce or sell the whole or parts of the business, may involve a transfer of ownership to a new owner or controlling party. Should this occur, where considered necessary, your personal data will be transferred to the new owner or party, under the terms of this Privacy Notice.
- CCTV recording for the protection and wellbeing of our customers and employees
- Certain location-based data (e.g. POS or Rotacloud passcodes).
- Personal Identification document checking for employment purposes
- Transaction information for financial auditing purposes
- Prevention of fraudulent activity in our premises or within our systems

### **Cookies**

We use cookies on our site in order to preserve the information stored as you add items to your order, to maintain your order history and to measure the site activity, so we can identify which pages are visited most frequently. We use this information to ensure we guarantee you the most efficient and enjoyable purchasing experience. You can set your browser to stop cookies or to let you know when cookies are being sent, however this will disable the function of a lot of the site and will prevent you from making a purchase.

### **Third Party Links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.