

PRIVACY NOTICE

The Study – Training Restaurant

This privacy notice is for the processing of personal information collected when you attend *The Study* training restaurant.

The data controller for the information being collected and used is South Lanarkshire College. Our registered office is College Way, East Kilbride, G75 ONE. If you have any concerns or queries about how we use your personal data you can contact our Data Protection Officer at dpo@slc.ac.uk

Your personal information

The following information will be processed:

- Name and title
- Contact details (phone number and email address)
- Booking details (date, time, party size, dietary requirements)
- Details of source referral
- Financial transaction data (including payment card details)
- Your preferences (direct marketing purposes)

How we will use your information

The College will use your personal information for the following purposes:

- To confirm your reservation and related notifications
- To contact you to discuss dietary requirements
- To process payment in exchange for services
- To add you to our client database
- To consider concerns or complaints
- Direct marketing: to send you promotional e-communications, if you consent to this
- Request feedback on your restaurant experience through electronic surveys

Our lawful basis for using this information

- Article 6 (1)(b) Contract: Collecting your personal information is necessary to create a
 reservation and therefore for the performance of the contract we have with you to provide
 restaurant services.
- Article 6(1)(e) Public task: This is our additional lawful basis for handling any complaints in line with the Scottish Public Services Ombudsman Act 2002 and in accordance with the Model Complaints Handling Procedure.
- Article 6 (1)(c) Legal obligation:
 - o Financial transaction data is kept in line with FCA guidelines.
- Article 9 (2)(a) Explicit Consent: this is our additional lawful basis for processing special category data regarding food allergies or intolerances you may share. Please be aware if you



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do not disclose food allergies or intolerances in advance of your visit, we may not have adequate ingredients or resource to accommodate last minute requests.

- Article 6 (1)(a) Consent: If you opt-in to receive marketing communications, then we will
 process this under the lawful basis of your consent. You can withdraw your consent at any
 time by emailing thestudy@slc.ac.uk.
- Article 6 (1)(f) Legitimate Interests: It is the legitimate interest of the College to request and
 obtain feedback on your dining experience via e-surveys, as your views and ideas may help
 to improve the running of the restaurant and services offered. Completion of surveys is
 optional, and you can click the opt-out button that appears at the bottom of any survey to
 decline your future participation.

Sharing Your Information

Your data will be shared with IT system providers of the restaurant reservation system and client database.

If you use **Instagram** to contact the College, any information shared is also captured by Instagram, as a condition of using messaging services. More information is available in the Instagram <u>privacy</u> notice.

Payments received by debit or credit card will be processed by **WorldPay** payment processing company, and use of personal data can be read in their <u>privacy notice</u>.

Bright Signals, a UK-based survey tool provider, collates and provides feedback analysis to the College.

The College uses **MailJet** to send marketing email communications. You can access their privacy notice here.

Transfer outside the UK

Mailjet are a European-based data processor. The transfer of your personal data outside the UK is necessary to provide you with a marketing email communications service and is covered by the adequacy arrangement that the UK government has with EU countries. Any data sharing is carried out securely in compliance with the UK GDPR principles.

<u>Instagram</u> and <u>WorldPay</u> are separate global companies, based in the US. For further details of how each of these companies may use your personal data, including the transfer of data outside of the UK and beyond the EU, please read the linked privacy notices.



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Retention of Information

The College will retain your data for as long as it's required for the purpose and as detailed below:

- Booking reservations your contact and reservation details are added to our client database and held for 6 years from the date of your last visit.
- Restaurant receipts will be stored for 2 years.
- Marketing details your data will be held for 2 years, if you consent to marketing.
- Survey responses will be stored for 12 months.

Payment card transaction data – is collected and retained by WorldPay, as per their <u>privacy notice</u>.

Your Rights

- Right of access to copies of your personal data (subject access request)
- Right to rectification if personal data we hold about you is incorrect
- Right to restrict processing of your personal data
- Right to complain to the Information Commissioner's Office about how we handle your data.

In some circumstances you may also have the following rights:

- Right to request erasure of your personal data (deletion)
- Right to data portability