

## **‘Wetherspoon Order and Pay App’ Mobile Application Privacy Policy**

JD Wetherspoon Plc (**We, Our, Us and all similar references**) are committed to protecting and respecting your privacy.

### **SCOPE OF POLICY**

This policy, (together with Our end-user licence agreements as set out at (Apple devices) <http://www.apple.com/legal/internet-services/itunes/appstore/dev/stdeula/> or (Android devices) [https://play.google.com/intl/en\\_uk/about/play-terms.html](https://play.google.com/intl/en_uk/about/play-terms.html) (**the EULAs**) and any additional terms of use incorporated by reference into the EULA, collectively **Our Terms of Use**) applies to your use of:

- the Wetherspoon Order and Pay mobile application software (**App**) hosted on (Apple devices) the Apple iTune App Store or (Android devices) the Google Play store (**App Site**), once you have downloaded a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**)

This policy sets out the basis on which any personal data We collect from you, or that you provide to Us, will be processed by Us. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the Data Protection Act 1998, the data controller is JD Wetherspoon Plc of Wetherspoon House, Reeds Crescent, Watford, WD24 4QL.

### **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following data about you:

- **Information you give to Us (Submitted information):** You may give Us information about you by filling in forms on the App Site and the Services Sites (together **Our Sites**), or by corresponding with Us (for example, by e-mail or chat). This includes information you provide when you register to use the App Site, download or register an App, subscribe to any of Our Services, search for an App or Service, make an in-App purchase (including order history), and when you report a problem with an App, Our Services, or any of Our Sites. The information you give Us may include your name, address, e-mail address and phone number, the Device's phone number,
- **Information We collect about you and your device:** Each time you visit one of Our Sites or use one of Our Apps We may automatically collect the following information:

- technical information, including the Apple assigned non-identifiable unique ID placed on your device when the application is installed, time zone setting and location of the device (Device Information);
  - details of your use of any of Our Apps or your visits to any of Our Sites including, but not limited to, traffic data, location data, and the resources that you access (Log Information).
- **Location information.** We use GPS technology to determine your current location. Our location-enabled Services require your location data for the feature to work. If your settings do not currently permit the use of location services you will be asked to consent to your data being used for this purpose.
  - **Information We receive from other sources (Third Party Information).** We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

If you contact Us, We may keep a record of that correspondence.

- **Unique application numbers:** when you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to Us.

#### **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- Submitted Information: to confirm the order, process the payment, create order history and for App personalisation.
- Log information: for order history and troubleshooting.
- Location information: for GPS tracking to locate the nearest venue and route planning.
- Third Party Information: information required by (Apple Devices) Apple (<http://www.apple.com/uk/privacy/privacy-policy/>) or (Android Devices) Google (<https://www.google.co.uk/intl/en/policies/privacy/>) and Paypal (<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>) to fulfil orders.

- Unique application numbers: Apple and Google assign a non-identifiable unique ID when the App is downloaded, this is used to create order history/repeat orders and personalise the App.

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

#### **RETENTION TIME**

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

#### **DISCLOSURE OF YOUR INFORMATION**

We may disclose your personal information to third parties:

- In the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets.
- If JD Wetherspoon Plc or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If We are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
  - enforce or apply the EULA, Our Terms of Use (available at <https://www.jdwetherspoon.com/>) and other agreements or to investigate potential breaches; or
  - protect the rights, property or safety of JD Wetherspoon Plc, Our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **WHERE WE STORE YOUR PERSONAL DATA**

The data that We collect from you will be transferred to, and stored at, a destination inside the European Economic Area (EEA) by Zonal Retail Data Systems Ltd. It will be processed by staff operating inside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or

processing. JD Wetherspoon Plc and Zonal Retail Data Systems Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to Us is stored on secure servers. Any payment transactions carried out by Us or Our chosen third-party provider of payment processing services will be encrypted.

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 Sites; 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 collect and store personal data on your Device using application data caches.

#### **YOUR RIGHTS**

You have the right to ask Us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise the right at any time by contacting us at Customer Services, JD Wetherspoon, Wetherspoon House, Reeds Crescent, Watford, WD24 4QL or [customerservices@jdwetherspoon.co.uk](mailto:customerservices@jdwetherspoon.co.uk)

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

#### **ACCESS TO INFORMATION**

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request may be subject to a fee (currently £10) to meet Our costs in providing you with details of the information We hold about you.

#### **CHANGES TO PRIVACY POLICY**

Any changes We may make to Our privacy policy in the future will be posted on this page. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

#### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Customer Services, JD Wetherspoon, Wetherspoon House, Reeds Crescent, Watford, WD24 4QL or [customerservices@jdwetherspoon.co.uk](mailto:customerservices@jdwetherspoon.co.uk)