

## **1. WHO WE ARE**

Bertotti Ltd (“Bertotti” or “we” or “us”) has been offering freshly prepared, delicious food and organic coffee for over 7 years.

Bertotti Ltd cares about your privacy and is committed to processing your personal information fairly and transparently and in accordance with data protection law, including the General Data Protection Regulation ("Data Protection Law"). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. If after reading this Privacy Notice you still have questions feel free to drop us a line by using the contact details set out at section 14 below and our customer services team will be happy to help.

For the purpose of the Data Protection Law, the data controller 104 Goldhawk Road W12 8HD

## **2. WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?**

When you visit [www.bertottipureitalian.co.uk](http://www.bertottipureitalian.co.uk) (the/our "Website") you may be asked to provide information about yourself including your name, address, date of birth, email address, telephone number, your location, and your payment credit card information. Where you make a complaint about our services via Facebook, Twitter, or any other public domain, we may use that information to get in touch with you so that we can (a) respond to your complaint; and/or (b) compensate you for any poor service or product you've received. In addition, we may get in touch with you where you have posted a blog post or article about us. In the event that we do, we will only use your information to get in touch with you. We will not subsequently store your information on our systems.

Some of your personal data is collected directly, for example when you set up an on-line account on our Website, or send an email to our customer services team. Other personal data is collected indirectly, for example your browsing or shopping activity. We may also log general information about your browser whenever you visit our Website. This information may include your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit on our Website, the time and date of your visit, and the time spent on each page. Like most website operators, we collect this data to better understand how our visitors use our services, and how we may improve your experience of our Website in future.

The above is not an exhaustive list and, in specific instances, we may need to collect additional data for the purposes set out in this notice.

Some of the information we collect from you is collected and processed for the purpose of legal compliance, some to perform a contract with you, and some for the purposes of our legitimate business interests (subject to your rights), e.g. to analyse the use of our Website and services in order to continually improve our services.

### **3. INFORMATION THAT WE RECEIVE FROM OTHER PEOPLE**

We work closely with third parties (including, for example, business partners, sub-contractors in technical, and delivery services, advertising networks, analytics providers and search information providers) who may collect personal information from you and pass it on to us. Our staff may also give us emergency contact information as part of our emergency scenario planning and may give us details of their dependants in relation to their employee benefits arrangements. Where this is the case the relevant third party is responsible for obtaining the relevant consents from you (if necessary) to ensure you are happy with the ways in which your personal data will be used.

### **4. HOW IS YOUR INFORMATION USED?**

We may use your information:

- to provide you with access to the relevant parts of the Website;
- where necessary, to notify you about changes to our services or our Website;
- to administer our Website and for internal operations;
- to keep our Website safe and secure;
- to improve your user experience, by ensuring that content is presented in the most effective manner;
- to process any request you may have made;
- to process any orders made via our delivery service;
- to carry out our obligations arising from any contracts entered into between us;
- to process any entries that you make into competitions run by us;
- to seek your views or comments on the services we provide;
- to notify you of changes to our services;

- to verify your identity;
- for crime and fraud prevention, detection and related purposes;
- for market research purposes – so that we can understand your needs better;
- for customer services purposes – so that we can talk and interact with you;
- to process a job application; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

Where you have consented at the time we collected your data or where we otherwise have a right to do so, we may use your information to let you know about our services that may be of interest to you and/or inform you about important changes or developments to the Website or our services, by post, telephone, mobile messaging (e.g. SMS, MMS etc.) as well as by e-mail.

If you change your mind about us using your data in the ways described in this notice, please let us know by contacting us using the details set out in section 14 below. You may also opt out of receiving marketing emails from us by following the instructions outlined in the relevant communication.

## **5. WITH WHOM DO WE SHARE YOUR INFORMATION?**

### a. Third Party Service Providers working on our behalf

In order to make certain services available to you, we may pass your information to our third-party service providers, agents and subcontractors. These include IT, delivery and marketing service providers and payment processors (for example, to process deliveries and send you your order confirmation). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. We will only allow our selected third party providers to handle your personal data once we are satisfied that they apply appropriate data protection and security controls.

### b. Third Party Marketers

If you have consented, we may allow carefully selected third parties, including marketing and advertising companies, or our business partners,

to contact you occasionally about services that may be of interest to you. They may contact you by telephone, post, SMS as well as by e-mail. We may also employ third-party companies and individuals on our Website (for example, analytics providers and content partners). If you change your mind about being contacted by these companies in the future, please let us know by contacting us using the details set out in section 14 below. You may also opt out of receiving any marketing communications you receive by following the instructions outlined in these communications.

c. Third Party Providers we work with

Bertotti LTD works closely with our third party suppliers to bring you high quality services and products. When you send us feedback or comment on any of our products or services we may need to share such feedback/comment with our relevant supplier(s). Before we do this, any information you provide to us will be anonymised (unless you specifically consent to having your details passed on to the relevant supplier(s) at the time).

d. Third Parties with whom we transact

If any of our businesses enter into a joint venture with, purchase or are sold to or merge with another business entity, or in the unlikely event that we go out of business or enter bankruptcy, your information may be disclosed or transferred to the target company, our new business partners, administrators, or owners or their advisors.

e. Sharing to comply with legal obligations

We may use the information that you provide to us if we are under a duty to disclose or share your information in order to (a) comply with (and/or where we believe we are under a duty to comply with) any legal obligation; (b) enforce or apply our website **terms of service** and any other agreement; or (c) protect the rights, property, or safety of Bertotti LTD, customers, employees, contractors or others. This includes exchanging information with other companies and other organisations for the purposes of fraud protection and prevention, or where we have to carry out an internal investigation.

## **6. YOUR RIGHTS**

We will usually inform you (before collecting your information) if we intend to use your information for marketing or research purposes or if we intend to disclose your information to any third party for such purposes. However,

Bertotti LTD understands that sharing personal data can be a bit scary at times so you have a choice about if you wish to receive information from us.

If you do not wish to receive direct marketing communications from us, then you can select not to by not ticking the relevant boxes, unsubscribing by following the instructions in the relevant marketing communication, or by contacting us via Talk to Bertotti LTD page and we will get back to you.

Should you have any queries or complaints in relation to how we use your information, please contact us via the details set out at section 14 below. Should you wish to take any complaints or queries further, you have the right to contact your local data protection regulator (which, in the UK, is the Information Commissioner's Office) regarding such issues.

You have the right to see the information we hold about you and to ask us to: (a) make any changes to ensure that any information we hold about you is accurate and up to date; (b) erase or stop processing any information we hold about you where there is no longer a legal ground for us to hold it; or (c) in some cases, transfer any information we hold about you to a specified third party. If you wish to do this, please contact us using the contact details set out below.

## **7. SO HOW DO WE PROTECT YOUR INFORMATION?**

We take security seriously, and do what we can within commercially acceptable means to protect your personal information from loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, destruction and damage. We ensure only the minimal amount of data about you is stored and that very few people have access to it. Access to the information is also audited on a regular basis to ensure access has not changed in any way. We will only keep your information for as long as we reasonably require and, in any event, only for as long as Data Protection Legislation allows.

We use technical encryption tools to protect your data and carry out penetration testing of our systems. We have security controls in place to protect our IT systems from external attacks and unauthorised access. We also have internal policies and guidelines for our employees to follow. If you would like to find out more please contact customer services via the [GETINTOUCH@BERTOTTIPUREITALIAN.CO.UK](mailto:GETINTOUCH@BERTOTTIPUREITALIAN.CO.UK) and we will give you all the information you need for peace of mind.

Where you have chosen a password which allows you to access certain parts of the Website, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk.

## **8. PROFILING**

Bertotti LTD does not intentionally profile our customers. Sometimes profiling is inevitable though as the information you give us may suggest gender or marital status. We do not use this personal information to create any covert profiles about you or make any automated decisions about you or your preferences.

## **9. LINKS TO OTHER WEBSITES**

Our Website may contain links to other websites run by other organisations (for example, we use social media sites such as Facebook, Instagram and twitter). Bertotti LTD privacy notice applies only to our Website and company, so we encourage you to read the privacy notices on the other websites you visit. We cannot be responsible for the privacy notices and practices of other sites even if you access them using links from our website.

## **10. YOUNG PEOPLE**

Bertotti LTD does not directly advertise to our young customers nor do we store data about them on a regular basis. However our Bertotti LTD Academy (which runs programmes for apprenticeships) and Bertotti LTD Big Experience week are aimed at people who are aged between 16-18 years-old. To take part in these great opportunities Bertotti LTD does need to gather some data about those young people, just like we would for a full Team Member. For example, we will need their name, address and telephone number. Bertotti LTD collects and treats this data in compliance with Data Protection Laws and with the utmost care, applying very strict rules and scrutiny to those individuals that have access to it.

## **11. COOKIES**

While we're very proud of the delicious cookies we sell in our shops, this is about a different sort of cookie. The cookies we're talking about here are the digital ones that our website uses in order to make your experience as

enjoyable as if you were in one of our shops. For much more detail please refer to our [cookie policy](#).

## **12. FREE CUSTOMER WI-FI**

We offer free Wi-Fi to all our customers in our shops, this free service is provided by a third party that provides this service on Bertotti LTD behalf.

### **How we use the Wi-Fi data**

We use Wi-Fi data to better understand our customers and to enable us to better serve their needs, this data is totally anonymous and no personal data is used.

The Wi-Fi data allows us to:

- Understand how frequently customers come to us
- Understand how many of our customers are first-time customers
- Understand how long customers spend in the shops and on the Wi-Fi
- Monitor numbers of passer-by for our shops
- Understand key differences between our shops
- Understand how these factors change over time

## **13. DATA SHARING**

In addition, to the data sharing described in section 5, the information that we collect from you may also be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the provision of support services. By submitting your personal data, you are acknowledging this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this privacy notice and the Data Protection Legislation. This means that we will only transfer your information to third parties that (a) are in countries that have been confirmed by the European Commission to provide adequate protection to personal information; or (b) have agreed to provide all protections to your personal information as set out in the Data Protection Legislation.

## **14. FINALLY**

If you have any questions feel to visit our [getintouch@bertottipureitalian.co.uk](mailto:getintouch@bertottipureitalian.co.uk). Or call Customer Service on 02086167973 between 08.00 - 18.30 Monday - Friday

