



Privacy Notice

Introduction

This document refers to personal data, which are defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR), seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. The transfer of personal data between EU member states and 3rd Countries will be controlled and only conducted in accordance with the Group's data protection policy and where the 3rd country has shown a sufficient 'adequacy' (Article 45 GDPR) of the level of protection offered to data subjects rights. GDPR does not apply to information already in the public domain.

The Liberation Group Limited, together with the wholly owned subsidiary companies, listed below (together 'The Group').

Jersey

A E Smith & Son Limited
Citann Limited
Longueville Distributors Limited
Victor Hugo Limited
The Old Court House Hotel (1972) Limited

Guernsey

Bucktrout & Co Limited
Guppy's of Guernsey Limited
The Guernsey Brewery Co. (1920) Limited

UK

Butcombe Brewery Limited
Butcombe Brewing Co Limited
M Still Catering Limited
The Royal Oak Inn Trading Limited

The Group is pleased to provide the following Privacy Notice:

Personal Data

The Group uses the information collected from you to send to you marketing, product, event and venue information which the Group believes may be of interest to you or your family. You will be given an opportunity to opt-in to receiving information about The Group's promotions and products.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence, membership to The Group's loyalty card scheme and details of your visits to our website, including but not limited to personally identifying information such as Internet Protocol (IP) addresses. The Group may from time to time use such information to identify its visitors. The Group may also collect statistics about the behavior of visitors to its website.

The Group's websites use cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. The Group uses Google Analytics Solutions to help identify and track visitors to its websites and their website access preferences. Visitors to the Group's websites who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Group's website. To find out more about the cookies Google Analytics Solutions use, please visit www.policies.google.com/technologies/cookies

Applications for the Group's loyalty card scheme will be processed by a 3rd party partner and will be secured in accordance with this policy. Members of the scheme have an opportunity to opt-in to various options and give consent to share their information with the Group's 3rd party partner.

Any information the Group holds about you encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers.

The Group will only collect the information needed so that it can provide you with marketing, product, event and venue information. The Group does not sell or broker your data, although with your consent we may share your information with a 3rd party partner to improve our service and products.

Legal basis for processing any personal data

To meet the Group's contractual obligations to clients and employees.

Consent

By agreeing to this privacy notice you are consenting to the Group processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing DPA@Liberationgroup.com or writing to us (see last section for full contact details).

Use of CCTV and Photography

In premises owned or managed by the Group where CCTV is in operation, clear signs will be displayed to show its use and images recorded will be retained for a period of 1 month from recorded date.

These images will be disclosed to 3rd parties only in the event of criminal activity on the premises, a formal request by a law enforcement agency or for internal investigations.

The use of photography within the premises will be used on occasion for marketing and promotional purposes. If images are taken of persons, who are the main subject of the image, consent will be obtained beforehand. Images of groups on the premises will, on occasion be publicised on The Group's website or social media sites and may be reused at the discretion of The Group.

Social Media

If you are using The Group's social media, please remember that The Group's social media are provided via social media sites, which have their own functionality, terms and privacy policies. You should be aware that these functions are part of the social media site and are subject to the social media site's terms and privacy policy and not those of The Group. Please ensure you have read these carefully and have checked your personal settings to ensure you are happy with how your information will be used by the social media site. The Group's social media may make use of these functions, but the Group does not control them and is not responsible for them. The Group will not assume responsibility for data shared or the responsibility of a data controller, that responsibility will remain with the social media provider.

The Group will monitor the social media site on occasion and, as soon as practically possible, any inappropriate entries will be removed.

Disclosure

The Group may, on occasion, pass your Personal Information to third parties exclusively to process work on its behalf. The Group requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

The Group does not broker or pass on information gained from your engagement with The Group or website without your consent. However, The Group may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The Group may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of The Group, its clients and/or the wider community.

Retention Policy

The Group will process personal data during the duration of any contract and will continue to store only the personal data needed for seven years after the contract has expired, to meet any legal obligations. After seven years any personal data not needed will be deleted.

Data storage

Data are held in Europe using different multiple servers. The Group does not store personal data outside the EEA.

Your rights as a data subject

At any point whilst The Group is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

If the Group refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to challenge legally.

The Group, at your request, will confirm what information it holds about you and how it is processed.

You can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the Data Protection Advisor, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of The Group or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients to whom the data are/will be disclosed.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the Office of the Information Commissioner (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

The Group will accept the following forms of ID when information on your personal data is requested: a copy of your driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If The Group is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to DPA@Liberationgroup.com or writing to us at the address below. A Data Subject Access request form can be obtained from The Group's website, in the Policy section. There is no fee for obtaining this information, but if the request is deemed excessive or repetitive an administration fee may apply.

The Group has one month to provide the requested information in a usable format. If necessary, The Group can apply to the data subject or relevant Information Commissioner for an extension of an additional month.

Complaints

If you wish to make a complaint about how your personal data is being processed by The Group or its partners, you have the right to complain. If you do not get a response within 30 days, you can complain to the Office of the Information Commissioner.

The details for each of these contacts are:

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| <p>The Liberation Group Ltd, attention of the Data Protection Advisor,</p> <p>19 Royal Square, St. Helier Jersey JE2 4WA</p> <p>Telephone 01534 764000 or</p> <p>Email: DPA@Liberationgroup.com</p> | <p>Office of the Information Commissioner – Jersey</p> <p>Brunel House, Old Street, St. Helier Jersey JE2 3RG</p> <p>Telephone 01534 716530 or</p> <p>Email: enquiries@dataci.org</p> |
| <p>Bucktrouts Quality Drinks, attention of the Data Protection Advisor,</p> <p>Elizabeth Ave Admiral Park</p> | <p>Office of the Data Protection Commissioner - Guernsey</p> <p>Information Centre North Esplanade,</p> |

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| <p>St Peter Port GY1 2HX</p> <p>Telephone: 01481 727208 or Email: DPA@Liberationgroup.com</p> | <p>St Peter Port Guernsey GY1 2LQ</p> <p>Telephone: +44 (0)1481 742074 or Email: enquiries@dataci.org</p> |
| <p>Butcombe Brewery Ltd, attention of the Data Protection Advisor,</p> <p>Cox's Green Wrington, Bristol, BS40 5PA</p> <p>Telephone: 01934 863963 or Email: DPA@Liberationgroup.com</p> | <p>Information Commissioner's Office –</p> <p>Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Telephone: 0303 123 1113 or https://ico.org.uk/concerns/handling/</p> |