How Punch uses your information when you visit www.sellyourpub.co.uk

This privacy notice was last updated on 16 July 2018.

1 Who we are

We are Punch Taverns Limited (**we, us, our)**, a company incorporated in England and Wales with registered number 3752645, with registered office at Jubilee House, Second Avenue, Burton-upon-Trent, Staffordshire, DE14 2WF.

We are also registered with the Information Commissioner's Officer with registration number Z1301910. This registration covers the uses of personal information set out below.

We have a Data Protection Officer, who acts independently on our behalf to monitor and advise us on compliance with all applicable data protection laws in England and Wales. Our Data Protection Office can be contacted on data.protection@punchtaverns.com.

2 About this privacy notice

This privacy notice tells you what to expect when we collect personal information on our website www.sellyourpub.co.uk (**our website)**.

We keep this privacy notice under regular review in order to ensure that it properly reflects our use of personal information and the date it was last updated can be found at the top of this page.

3 How we collect your personal information and why

When you use our website, you have the option of providing the following details if you are interested in selling your pub: your name, pub name, pub post code, email address and phone. The form used to capture these details is powered by, and therefore your personal information is stored and hosted on, Survey Monkey. Survey Monkey's privacy notice can be found at https://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=footer.

We collect your personal information as it is in our legitimate interest to establish which publicans may wish to sell their pubs and this allows us to get in touch with you about your pub if you have expressed interest in selling it. We do this by extracting your personal information from Survey Monkey and then sharing it securely with third party agents who will contact you on our behalf using email and/or phone, depending on what details you have provided on the form. The third-party agents we currently use are: (1) Everard Cole; (2) James A Baker; and (3) Matthew Phillips Surveyors.

If at any time you change your mind about selling your pub and are no longer interested in doing so, you can contact us on the details provided in Section 9 and we will make sure that you no longer receive any contact from us or our third-party agents about purchasing your pub.

Once we collect your personal information, we retain it for a period of 6 years after which we will destroy or delete it.

4 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our website for our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our website, which allows us to provide you a better experience and also allows us to improve our website.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies as described below. However, if you do block cookies there may be parts of our website that you will be unable to access or that will not function properly.

(a) Our cookies help to:

(i) make our website work as you would expect;

(ii) improve your and other users' experiences of our website;

(iii) improve the speed/security of our website.

(b) We do not use cookies to pass personal data to third parties.

(c) We use analytical/performance cookies.

They allow us to compile visitor statistics recognise and count the number of visitors and to see how visitors move around our website when they are using it. It also compiles data on what technology you are using (e.g. Mac or Windows), which helps to identify when websites are not working as they should be for particular policies. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Analytical/performance cookies			
Cookie Name	Category	Expiry	Description
ep201	Functional	1 hour	Set by load balancer. User tracking for abuse and troubleshooting problems.
ep202	Functional	90 days (this time resets from time of last access)	Used as a unique user identifier to test experiences (e.g. display various color combinations to identify what's most effective). It's also used on our respondent experience page to measure survey completion rates.
RP_XXXXXXXX	Required	90 days	Enforces the one response per computer setting.
sso_user	Required	90 days	Determines if certain Enterprise respondents are authenticated if an account holder requires respondents to authenticate.
CX_XXXXXXXX and P_XXXXXXXX	Functional	1 year	Used for pop-up surveys to track whether the survey was already taken to avoid re-showing the pop-up.
sm_ir	Functional	session	Used by the instant results page so a survey creator can display data.

(d) Third party services

Whenever you visit our website, we will use a third-party service, Google Analytics, for our legitimate interests, to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we

use this service is so that we can find out how many people visit the website and the various parts of the website. This information helps us to find out how our website is working and how to improve it. We do not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our website.

You can opt-out of being tracked by Google Analytics by visiting http://tools.google.com/dlpage/gaoptout. We'd prefer you didn't opt out, as this data is helpful to us in improving our website.

Google analytics cookies		
Cookie Name	Expiry	Description
__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	10 minutes	Used to throttle request rate.
__utmb	30 minutes from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmc	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	6 month from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.

(e) Turning cookies off

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. The "Help" function within your browser should tell you how. Alternatively you can visit http://www.attacat.co.uk/resources/cookies/how-to-ban or www.allaboutcookies.org, which provide general information about cookies and how you can manage cookies on your computer.

Please be aware that switching off cookies is likely to limit the functionality of our website.

It may be that if you have concerns around cookies they in fact relate to so called "spyware". Rather than switching off cookies in your browser you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive.

5 Disclosure of personal information

We do not transfer your personal information outside of the EEA.

We will not usually disclose your personal information other than as already explained in Section 3 above. However, there may be circumstances where we need to share personal information other than as anticipated in Section 3 above. These include:

(a) where we are legally required to disclose the information. This includes sharing the personal information with tax authorities and law enforcement agencies in their legitimate interests, for the purposes of the prevention and detection of crime;

(b) where we need to disclose the personal information for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights, where this is in our or a third party's legitimate interests;

(c) disclosure is required to protect our interests, or someone else's interests (for example, to prevent fraud);

(d) disclosure is necessary to protect your vital interests (for example, if you are unwell at one of our premises, we may need to seek medical assistance);

(e) it is to a third party for the purposes of providing administrative or processing services on our behalf (for example, the third-party agents who contact you on our behalf). If such disclosure is required we will take steps to ensure that the third party protects the personal information in the same way that we do and notify you of any changes to this privacy notice; and

(f) to any prospective purchaser of our business assets or organisation.

6 Keeping personal information secure

We know that you provide your personal information in good faith and expect it to be looked after. This is why we take the security of your personal information seriously. This means that we have taken steps internally in order to ensure that our systems adequately protect your personal information. This includes:

(a) locating all internal servers within the EU, more particularly the UK; and

(b) ensuring strict access controls on a need to know basis; and

(c) operating onsite security measures.

7 Your rights

You have rights in respect of your personal information and this Section explains a bit more about those rights that are applicable to what we do with your personal information and when you can exercise them. If you would like more information about any of your rights, please contact us on the details set out below. Please allow us up to 7 calendar days to process your request and remove you from our mailing list.

7.1 Opting out from receiving marketing

Where you have completed the enquiry form on our website and no longer wish to receive any marketing or communications about selling your pub, you can opt out. If you wish to opt-out, please do so by sending your request in writing to us at data.protection@punchtaverns.com or our address as set out below

Please allow us up to 7 calendar days to process your request and remove you from our mailing list.

7.2 Accessing your personal information

We want you to fully understand and be comfortable with how we use your personal information. You can contact us at any time to ask whether we process any personal information about you. If we do hold or use your personal information in any way, you have the right to access that personal information. All we ask is that:

(a) you make your request to access in writing to the contact details below;

(b) you verify your identity; and

(c) you are fair and reasonable with how often you make this kind of request.

Please allow us up to one month from receipt of your request in order to provide a response.

7.3 Requesting more information

We hope that you can understand that it is very difficult to cover all the possible ways in which we collect and use personal information. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal information develops. However, if you have any questions regarding our use of your personal information, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any specific questions, or need anything explaining, please get in touch on the contact details below.

7.4 Additional rights

You also have some additional rights that you may exercise as set out here. We may publish a policy, from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it here. In each instance we may ask you to make your request in writing to the contact addresses below and provide verification of your identity.

7.4.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address).

7.4.2 You have the right to request that we erase your personal information. Please be aware that we can only comply with such a request if:

(a) your personal information is no longer required for the purposes it was collected for (for example, we need your personal information to respond to a communication);

(b) the collection, storage or use of the personal information by us is prevented by law;

(c) your personal information is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings.

7.4.3 You have the right to request that we restrict or refrain from processing your personal information:

(a) for the time it takes us to verify the accuracy of your personal information where you have disputed its accuracy;

(b) where the collection, storage or use of the personal information by us is unlawful but you decide not to ask for erasure;

(c) where, we no longer need your personal information but you need them for the purposes of establishing, exercising or defending a legal claim;

(d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal information, where you have exercised your right to object to processing.

7.4.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.

7.4.5 You have the right to object to our use of your personal information:

(a) where we are using that information based on our legitimate interests, and where we do not have compelling overriding grounds to continue to use your personal information; or

(b) at any time, where we use your personal information to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

8 Complaints

You are important to us, and so is protecting your personal information. We have high standards when it comes to collecting and using personal information. For this reason, we take any complaints we receive from you about our use of your personal information very seriously and request that you bring any issues to our attention.

Where you are communicating with us for the purpose of making a complaint, we will only use your personal information to handle, investigate and respond to the complaint and to check on the level of service we provide. Where the complaint is about a member of our team, we may have to disclose your identity to whoever the complaint is about. You may let us know that you don't want information that identifies you to be disclosed and we will try to respect your request; however, it may not be always possible to handle a complaint on an anonymous basis.

If you are unhappy, you can also contact the Information Commissioner's office to make a complaint directly.

9 How to contact us

You can contact us by:

Post: Jubilee House, Second Avenue, Burton-upon-Trent, DE14 2WF.

Email: data.protection@punchtaverns.com

Telephone: 01283501600