



## J.W. Lees & Co Ltd C-19 Safe Privacy Policy

For information regarding our usual processing activities within J.W. Lees please view our main [Privacy Policy](#).

### What personal data do we collect?

Due to the Coronavirus pandemic, J.W. Lees is required to collect information from you when you enter our pubs and when you book a table with us. The information we collect from you regarding this processing activity includes:

- **Identity data:** Name.
- **Contact details:** Telephone number.
- **Booking details:** Lead booker on table plan during busy sessions, Microsoft Form completion time/check-in time.

### How do we collect personal data?

We collect your personal data when you book a table and when you arrive as a 'walk-in' via the QR code in our pubs in order for us to log all lead customers as potentially required by NHS Test & Trace.

The data we collect comes directly from you when performing any of the above actions. Failing to provide the required personal data may mean we are unable to allocate you a table at the pub.

### Our lawful basis for processing

J.W. Lees only process your personal data when we have a lawful basis to do so. The lawful basis for us collecting your personal data for the purposes of NHS Test & Trace is:

- **Public Interest:** To ensure the health and safety of the public due to Coronavirus for NHS Test & Trace.

### What do we use your personal data for?

Under General Data Protection Regulation (GDPR), we are required to inform you of our purpose for processing your personal data and what lawful basis we use in order to make the processing legal. Provided below is a table which describes the processing activity, the personal data collected from you and the lawful basis we rely on in order to process your personal information.

<b>Purpose for processing</b>	<b>Categories of data concerned</b>	<b>Lawful basis</b>	<b>Legitimate interests (if applicable)</b>
To collect your personal data in order to assist NHS Test & Trace.	<ul style="list-style-type: none"><li>• Identity Details</li><li>• Contact Details</li><li>• Booking Details</li></ul>	Public Interest	N/A



## J.W. Lees & Co Ltd C-19 Safe Privacy Policy

### Who are the recipients of your personal data?

We will only share the information that is necessary to the purpose of processing. Due to the current ongoing situation, we may be required to share your information with the NHS for NHS Test & Trace purposes. We share your personal data with the following third-party processors:

- **Microsoft** – We are using a Microsoft Form to collect the personal data required for NHS Test & Trace. This data will then be stored on our J.W. Lees Microsoft account.

### How long do we keep your personal data?

We will only retain your personal data for as long as necessary in order to fulfil the purpose for processing. The government have requested we retain the personal data relating to NHS Test & Trace for a minimum of 21 days from the date you visit the pub.

We regularly review the retention of information held within J.W. Lees to ensure that we are retaining your personal data for no longer than is necessary.

### Cross-Border data transfers

If we transfer your personal data outside the EEA, we must let you know.

Currently, for the processing of the personal data associated to the NHS Test & Trace, we do not transfer your data outside the EEA.

### Your rights

You have certain rights in relation to the personal information we hold about you. These are the rights that apply to your personal data processed by J.W. Lees for the purposes of NHS Test & Trace:

- **Right to be informed:** You have the right to know what information we hold and process about you.
- **Right of access:** You have the right to ask for a copy of the information we hold.
- **Right to rectification:** You have the right to ask for us to correct any information we hold which may be inaccurate or incorrect.
- **Right to Object:** You have the right to object to J.W. Lees processing your data for the purposes of NHS Test & Trace.

If you would like to exercise any of these rights, please get in contact with us using any of the details found below.



## **J.W. Lees & Co Ltd C-19 Safe Privacy Policy**

### **Contact Information**

If you have any questions about this policy or how your data is processed, please contact us at J.W. Lees & Co Ltd, Greengate Brewery, Middleton Junction, M24 2AX. You can also email our Data Protection Officer at [gdpr@jwlees.co.uk](mailto:gdpr@jwlees.co.uk) for more information.

Should you have any concerns about this policy or the way that we are processing data you have the right to lodge a complaint with the Information Commissioner's Office. Please visit their website at <https://www.ico.org.uk> for more details.