

## IDENTITY OF THE CONTROLLER & THE DATA PROTECTION OFFICER

Ello Group Limited is the fast-growing owner of Taste Marketing Limited (trading as tastecard and Coffee Club), Simard Limited (trading as gourmet society) and Hi-Life Diners Club Limited (trading as Hi-Life). Ello Group Limited are committed to protecting and respecting your privacy whilst remaining compliant with The General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA). For us to drive compliance, we have a Personal Information Management System which is compliant with BS 10012:2017.

Ello Group are the Data Controller and have an appointed Data Protection Officer who can be contacted via email using the below details. For those who are based in the EU you can contact our EU representative whose details are below.

This Privacy Notice is applicable to contacts of Ello Group Ltd and its subsidiaries. For end-users of products under any of its respective companies separate Privacy Notices can be found on each of their websites.

## PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING

If you complete a form on our website or one of our landing pages, then personal information is processed to take steps at your request, prior to entering a contract. This could be to display interest in a business-to-business partnership, as a restaurateur, or completing a job application on our website. If you then decide to do business with Ello Group, processing will be necessary for the performance of this contract.

We may also from time to time contact you for marketing communications, on the basis that we have a legitimate interest to contact you, due to the interest you have shown in our business or products. However, you will always have the option of unsubscribing from these emails. If you wish to unsubscribe, you can do so at any time responding to the sender requesting to be unsubscribed from marketing communications or via an unsubscribe link, or by contacting Ello Group directly through contact us. Updating your preferences can take up to 10 working days to reflect in our system. Please note that even if you decide not to subscribe to, or to unsubscribe, from promotional email messages, we may still need to contact you with important transactional information. For example, we will still send you confirmation when we provide updates to the Privacy Notice.

We may contact you by post or telephone or other electronic means (including email).

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide to us, for example, Information you submit via forms on the Website, and Information you provide us If you contact us such as;
  - **First Name, Surname, address and postcode** – So that we can contact you in writing and send correspondence in writing. If you are a restaurant, we will

use the venue address of the business to let members know where your restaurant is.

- **Email address** – We send communications via email and will send you informational messages as well as services which may interest you.
  - **Telephone numbers** – If there are any problems or we need speak with you, we need to be able to contact you quickly.
  - **Employment history** – If you are a job applicant, we will request a copy of your CV and reference information.
- Website usage Information, such as Information about the device you use to access the Website, connection Information (such as IP addresses), and Information about your use of the website (such as links that you click, how long you remain on the Website, and any errors that occur on the Website). We collect this information using cookies as described in our Cookie Policy.
  - If we email you, we may collect data such as whether the email has been delivered, opened, or bounced.
  - If you are invited to be interviewed for a job posting, we may take minutes of the interview.
  - We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

## RECIPIENTS OF THE PERSONAL DATA

Ello Group may be required to transfer the personal information provided by its customers to third parties. The following are categories of recipients that customer information could be transferred to:

- Data Centres – This is so we can store your data securely
- Fulfilment Houses – To allow us to send you written communication.
- External IT Providers – To provide us with disaster recovery and back up services.
- Email communication providers – To allow us to contact you via email and track your marketing preferences.

Survey Platforms – To create surveys on our behalf (your data is not shared with these providers unless you choose to complete a survey and accept their third-party terms). 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 site; 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 disclose your personal information to any member of our group (Ello Group Limited), which means our subsidiaries, our ultimate holding company, and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will not disclose your information to any of the relevant third parties listed above for marketing purposes.

If you are redirected to a third-party site for non-work-related activities and choose to enter your personal details, you will be bound by their Privacy Notice and may choose your own marketing preferences, which we have no control over and will not be responsible for.

Our Data Protection Officer can provide you with contact details of our third parties upon request if required. You can do this by contacting us using the details in the '**Contact**' section.

## DETAILS OF TRANSFERS TO THIRD COUNTRIES & SAFEGUARDS

Ello Group has an information system that requires them to transfer personally identifiable information to a third party located in a third country, controls are in place to ensure that the level of protection is not undermined and that security controls are at a level to commensurate with the type of information being transferred.

We also use an external IT service provider to assist us with the management of our IT systems and ensuring that our systems are secure. We do not transfer data to this organisation however they will have access to our systems to enable them to complete maintenance and IT support.

You can get an explanation of our safeguards by contacting us using the details in the '**Contact**' section.

## RETENTION PERIOD

Ello Group retain the personal information of job applicants that do not secure a role for 6 months after receiving the information, to allow the recruitment team to identify any other roles which may be beneficial to the applicant.

Client data whereby the data is not that of a natural person is stored no longer than necessary for the task to be performed. Using our basis of legitimate Interest this is to engage with you about our products and services that we think may be of Interest to you.

For all other corporate contacts, where there has been a period of 5 years after the end of our business relationship with no interactions between us, personal information is erased and securely disposed of.

After reaching these retention periods, the personal information is erased and securely disposed of.

## RIGHTS OF DATA SUBJECTS

As a Data Subject (individual) which Ello Group process information on behalf of, you have the right to withdraw consent from our marketing at any given time. You can exercise the right at any time by contacting us using the details in the '**Contact**' section. However, we will still be required to notify you of changes to the Privacy Notice, terms and conditions and any other legal requirement.

You have the right to make a Subject Access Request to Ello Group's Data Protection Officer if you wish to determine what personally identifiable information we hold on you. We welcome these requests and aim to respond within 72 working hours of receipt and process within 30 days.

You have the right to request your data to be erased. This can be done by contacting us on the below email addresses. Please bear in mind this is not an absolute right and there maybe instances where we cannot completely erase your data (e.g. When the personal data is required for the exercise of legal claims), if an exception does come up this will be discussed with you when you make the request.

You have the right to rectification. If you notice that any of your details are incorrect, please contact the customer service team who will be more than happy to rectify this. We will also send transactional reminders to request that you notify us of any changes to your personal data so that we can keep your data up to date.

You have the right to portability. This is where you would like to transfer your data to another organisation. To request this, please contact us on the below email addresses. We will provide this within a structured CSV file for you to provide to a third party.

You also have a right to lodge a complaint with the Supervisory Authority (Information Commissioners Office in the UK, Data Protection Commission for EU and Republic of Ireland), should you feel that we have not handled your information in line with legislative and regulatory requirements.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

## **AUTOMATED DECISION MAKING, INCLUDING PROFILING & INFORMATION ABOUT HOW DECISIONS ARE MADE, THE SIGNIFICANCE OF THE CONSEQUENCES**

We do not do any automated decision making on you as a business partner. Nor do we profile you as a data subject.

## CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time.

If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will make that clear on our websites or by email, so that you are able to review the changes.

If you wish to alter your Privacy settings or opt-out, you are able to do this by contacting us using the details in the '**Contact**' section

## CONTACT

Questions, comments, and requests regarding this privacy policy are welcomed and should either be emailed to [DPO@ellogroup.co.uk](mailto:DPO@ellogroup.co.uk) or addressed to the Data Protection Officer, Ello Group Limited, Birkby Grange, 85 Birkby Hall Road, Birkby, Huddersfield, HD2 2XB.

As the United Kingdom (UK) departed from the EU and for those residing in the European Union (EU) we have appointed IT Governance Europe Limited to act as our EU representative. If you wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR) or have any queries in relation to your rights or general privacy matters, please email our Representative at [eurep@itgovernance.eu](mailto:eurep@itgovernance.eu). Please ensure to include our company name in any correspondence you send to our Representative.

Our EU Representative postal address is:

IT Governance Europe Limited

6<sup>th</sup> Floor South Bank House

Barrow Street Dublin 4.