

# Privacy Policy

## Introduction

Milka's is committed to protecting your personal information and complying with the General Data Protection Regulations (GDPR). This policy describes how we collect, use, store and disclose your personal information.

Petar Gledić is the lead data controller in respect of personal data processed under this policy.

This policy applies to any Personal Identifiable Information (PII) provided by you through Milka's website (milkas.co.uk) or through your interactions with us.

It is important that you read this privacy policy together with any other privacy policy Milka's may provide on specific occasions from time to time when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your personal information. This policy supplements any such other policies and is not intended to override them.

## Why do we collect personal information about you?

Milka's collects personal information about you to inform you about, and provide you with, our services, to deal with any enquiries you may have about them and to improve and develop these and the site for the future.

## What Personal Information do we collect?

Milka's collects the following types of personal information about you:

- Identity data – Forename and surname, Company name (if relevant), gender, marital and family status (if you make this known to us in our dealings), birthday
- Contact data – E-mail address, Telephone number, Address, Billing name and address
- Transaction data – Details of Milka's you have purchased from us and information about whether or not payment has been made
- Profile data such as rooms or annexes booked by you, reservations in our restaurant, your interests and preferences and any feedback and survey responses
- Your preference regarding receipt of marketing from us

Through the checkout process you will be required to submit your payment information to our payment partner whose system uses SSL encryption. Only the payment partner will have access to your payment information and they will hold it in accordance with Data Protection legislation.

Depending on your settings or the privacy policies for other online services, you may give us permission to obtain information from your account with those other services. For example, if you're using the site on your mobile, you may choose to provide us with location data. The information we obtain from those services does depend on your settings for that service or their privacy policies. So you should always regularly check what those are.

With regard to each of you and your authorised users visits to our site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect the computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about the visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); services viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We also collect Aggregated Data includes statistical or demographic data, for example we may aggregate your usage data to calculate the percentage of users using a specific Website feature. Aggregate data is not considered personal data, however if we combine aggregate data with personal data, we then treat it as personal data.

### **How do we receive personal information about you?**

Milka's receives this personal information about you when you contact us directly at Milka's or via email or telephone or visit Milka's website to request to purchase services, to make a general enquiry, to book a room or annex, to provide us with feedback or to request marketing information.

### **How do we use Personal Information about you?**

We will only use your personal data when the law allows us to – where we need to perform a contract with you, where necessary for our legitimate interests where those are not overridden by your interests and rights, for legal compliance and where none of those apply, with your consent.

Milka's uses personal information about you:

- To identify who you are when you contact us
- To provide you with Milka's services you have requested (and note we may not be able to perform a contract to provide services if you fail to provide certain of the information requested)
- To ensure payment for Milka's services purchased and to prevent or detect fraud
- To understand which of Milka's services you may be interested in
- To contact you regarding Milka's services you have booked with any updates
- To contact you to answer your general enquiries or to administer warranty claims or product safety related communications
- To improve Milka's services and to carry out customer surveys
- To resolve complaints or issues you may have with Milka's services
- To manage our relationship with you
- To improve our customer relationship with you

We use the information we collect about you:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer
- As part of our efforts to keep our site safe and secure

You will receive electronic marketing from us only if you have requested this.

### **How will we contact you?**

Milka's and its third-party service providers (customer survey providers, payment partners) will contact you by post, telephone, email and/or text message depending on the reason for correspondence and only in accordance with this policy.

### **Who do we provide this personal information to?**

Milka's will provide your personal information to:

- Our service providers who perform services on our behalf, such as IT service providers who manage the site and its performance, our customer survey providers who we use to obtain feedback from customers on our behalf and our marketing fulfilment agencies for any marketing where you have confirmed you wish to receive it and to professional advisers who provide legal, consultancy, insurance or accounting services
- Analytics and search engine providers that assist us in the improvement and optimisation of the site

- The payment facilitators to process payment and to undertake fraud prevention checks.

In the event that you make payment over the phone then we directly input the payment details into our encrypted payment system. These details may be held to secure bookings and to draw payment of any booking fees or cancellation fees in line with our cancellation policy but will not be fully visible to us or otherwise recorded.

### **Where we store your information**

All personal information we have about you in store or through the site is stored on secure servers operated by Milka's or its third-party IT service providers. We have put or ensure that there are in place appropriate security measures and policies to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Where information has been passed to our third-party service providers it will be stored on their secure servers. These third-party service providers have access to your personal information needed to perform their functions but may not use it for other purposes. Milka's ensures that these third-party service providers will only process your personal data in accordance with this policy and applicable Data Protection legislation.

### **Data Transfers**

Your personal information may be processed by Milka's third party service providers operating outside the EEA in accordance with this privacy policy. Milka's will use appropriate safeguards to ensure that your personal data is treated securely and in accordance the Data Protection legislation in connection to such transfers or processing of your personal data outside the EEA.

### **Our CCTV system**

We employ CCTV on our premises in order to prevent, deter and detect crime. Our data may at times capture PII and therefore you can exercise your right to access this data by submitting a Subject Access Request. Please get in touch and we can advise you with this if required. Our video data is not retained after the retention period has elapsed.

### **Data Retention**

Your personal information will be held in Milka's customer relationship management systems for an indefinite period. Milka's will carry out periodic data cleanses of this information to ensure that it is up to date and accurate and it is still reasonably necessary for us to retain it to fulfil the purposes we collected it for.

### **Your rights**

You have the following rights in connection with your personal information processed by Milka's:

- **Access** – you can request access to your personal information and further details about how your personal information is handled by Milka's
- **Object** – you have the right to object to our processing of your personal information for direct marketing purposes or where the processing isn't necessary for the purposes of the contract between us or legitimate interests pursued by Milka's or by a third party
- **Rectification** – you can request rectification of any incorrect personal data held about you
- **Erasure** – you can request erasure of any personal data where the processing isn't necessary for the purposes of the contract between us or the legitimate interests pursued by Milka's or by a third party

You have a right at any time to withdraw consent to receiving marketing from Milka's and/or to amend the delivery method we use. To manage your rights and delivery preferences please follow the instructions in our marketing communications, enquiry forms or write to us at Milka's, 379 Iffley Road, Oxford, OX4 4DP or email us at [info@milkas.co.uk](mailto:info@milkas.co.uk)

Where you opt out of marketing, we may nonetheless retain your information in connection with previous transactions or correspondence for so long as is reasonably necessary in connection with the same.

You can also exercise any of these rights at any time by contacting us using the contact details provided below.

Please note when you seek to enforce any of your rights, we may need to request specific information from you to help us confirm your identity as a security measure. We may also contact you to ask you for further information in relation to your request to speed up our response.

If you are concerned or have questions about how Milka's handles your personal data please contact us and we will do our best to assist you.

Please note that you have the right to lodge a complaint with the UK Information Commissioner's Office (or any other appropriate supervisory authority), which may be accessed through the following link [ico.org.uk/concerns](https://ico.org.uk/concerns).

### **Changes to our privacy policy**

Milka's reserve the right to revise this privacy policy or any part of it from time to time. Please check back frequently to see any updates or changes to our privacy policy.

### **Contact**

Questions, comments and requests regarding this privacy policy should be addressed to Petar Gledić, [petar@milkas.co.uk](mailto:petar@milkas.co.uk).