



## Privacy Policy and Notice

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### A) WHO WE ARE

Puccino's Worldwide is a franchise coffee business that has been offering coffee and food for over 20 years. The Franchisor is Puccino's Worldwide Limited (company number SC369708). In most cases the Data Controller in respect of personal data covered by this policy with either by Puccino's Worldwide Limited or one of its franchisees.

At Puccino's, we regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

This policy applies to the processing of personal data in manual and electronic records kept by us in connection with various activities including our human resources function as described below. It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the personal data of job applicants, potential franchisees, existing and former employees, customers who write to us or get in touch, workers and self-employed contractors.

Most of the sites operated under the Puccino's brand are franchisees and they are committed to protecting your privacy.

### B) TYPES OF DATA HELD

We keep several categories of personal data in order to carry out effective and efficient processes. We keep this data in a secure place within our computer systems. This data includes:

- Data provided when you engage with us (e.g. sending us emails, contacting us via telephone or visiting or making an enquiry through the Website)
- Data you may provide about yourself including your name and contact details (e.g. your address, email address and telephone number)
- Your job title and CV where you apply for a role with us.
- Your personal details when you apply for a franchise with us.
- Data collected when you make use of our Site (e.g. your IP address and choice of web browser).

Some of this Personal Information is collected and processed so we can perform a contract with you, some for the purpose of legal compliance and some for the purposes of our legitimate business interests (namely to carry out and improve our business, analyse the use of our Site and services and support our staff and customers).

### CCTV

We also have CCTV in our sites and offices for the purpose of crime prevention and where this is used, we will display appropriate notices.

### FEEDBACK

Where you give feedback to or contact us we will only ever use your Personal Information to

respond directly to you in relation to your feedback and/or comment.

### **C) DATA PROTECTION PRINCIPLES**

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures

### **D) WHAT WE DO WITH YOUR PERSONAL INFORMATION AND THE LAWFUL BASES**

We acknowledge that processing may only be carried out where a lawful basis for that processing exists. We may process the data in the following circumstances:

- To fulfil a contract we have with you;
- When it is in our legitimate interest;
- To comply with the law;
- When you consent to it.

We may use your information:

- To process your application for employment
- To refer your application to the relevant franchisee (if applicable);
- For crime and fraud prevention, detection and related purposes;
- For customer services purposes – so that we can interact with you;
- Where we have a legal right or duty to use or disclose your information (e.g.in relation to an investigation by a public authority or in a legal dispute);

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate.

### **E) OUR SECURITY MEASURES**

We take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

We will only keep your Personal Information for as long as we reasonably require.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the Website; any transmission is therefore at your own risk.

## **F) SPECIAL CATEGORIES OF DATA**

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public

## **G) WHO WE SHARE YOUR DATA WITH**

Employees within our company who have the responsibility for recruitment will have access to your data, which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Data is shared with third parties for the following reasons: e.g. for the administration of payroll.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

## **H) YOUR RIGHTS**

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;

- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

Should you have any queries or complaints in relation to how we use your information, or if you wish to exercise any of these rights, please contact us at Puccino's Worldwide using the contact details as described above. Should you wish to take any complaints or queries further, you have the right to contact your local data protection regulator – the Information Commissioner's Office, regarding such issues.

#### **I) CONTACT DETAILS**

If you have any questions feel free to call our Global Head Quarters on 08458724699 between 08.00 and 17.00 Monday to Friday. You could also email us your feedback and comments, on [enquiries@puccinosww.com](mailto:enquiries@puccinosww.com).