

This Privacy Policy was last changed on 29th of August 2018.

WHO WE ARE

PHC Franchised Restaurants Public Limited (hereinafter referred to either as we, **PHC**, or the Company) respects your privacy and appreciates your trust to share your personal data with us that we will process carefully and sensibly. This policy sets out how we, as a data controller, collect and use your personal information, why we use it, with whom we share it, the rights to which you may be entitled and your choices about our use of your personal information.

This policy covers our use of your personal information arising from use of this website as well as for purchasing **Catercom Catering** products in any of our stores in **Cyprus**.

If you have any questions or need any further clarity please get in touch. Contact details are set out below.

Your information

Data collection and usage

We will collect and use your personal information to allow access to this website buy our products and services, apply for a job and other purposes set out in more detail in this section.

Your information may, if needed for the provision of our services to you, be shared with members of our group (PHC franchised restaurants public ltd group of companies (hereinafter PHC)) and some third parties.

Please see below the details on how we use your information and with whom we may share it.

1. Information that you give us to make a purchase, whether online or over the phone that might include:

- Your contact details including: your name, address, email address;
- Your credit card details;
- The details you provide to make a reservation or booking;
- The product purchased.

How we use it

We use this information, including to

- Provide our products and services;
- Manage and administer our services;
- Process your order;
- Take payment from or give you a refund;
- Help us ensure that our customers are genuine and to prevent fraud;
- Provide a reservation or booking service;
- Send personalised offers upon prior consent.

How long do we keep it

48 hours after the purchase unless you have provided your consent in which case we keep it for 2 years

2. Information about the way you use our services including:

- The products that we've provided or you've purchased;
- When and where you've made the purchases;
- What you paid and how;
- Whether you've opened electronic communications from us;
- Whether you've clicked on links in electronic communications from us.

How we use it

We use this information, including to:

- Develop new services;
- Improve our services;
- Identify products and marketing that may be of interest to you;
- Upon consent personalise our service of products and services you're interested in and how you use our services;
- Statistical analysis and research.

How long do we keep it

48 hours after the purchase unless you have provided your consent in which case we keep it for 2 years

3. Information when you communicate with us whether in person, through our website or via email, over the phone, through social media or via any other medium, including:

- Your contact details (this may include your social media account if that's the way you communicate with us);
- The details of your communications with us;
- The details you provide to us when you complete a survey;
- The details of our messages to you.

How we use it

We use this information, including to:

- Answer any issues or concerns;
- Monitor customer communications for quality and training purposes.
- Develop new services;
- Improve our services;
- Personalise your experience with us

How long do we keep it

48 hours after the purchase unless you have provided your consent in which case we keep it for 2 years

4. Information that we collect through your use of our website including:

- Device information upon consent such as operating system, unique device identifiers, the mobile network system;
- Hardware and browser settings;
- Date and time of requests;
- The requests you make;
- The pages you visit and search engine terms you use;
- Ip address

How we use it

We use this information, including to:

- Provide our services;
- Develop new services;
- Improve our services;
- Identify issues with the website and user's experience of it;
- Monitor the way our website is used.

How long do we keep it

48 hours after the purchase unless you have provided your consent in which case we keep it for 2 years or as defined in the cookies policy

5. Information that we collect from third party partners and corporate customers which could include:

- Payment processing companies;
- Your bank;
- Other entities in our group
- Other members of a loyalty scheme;
- Administrators of prize draws and competitions.

How we use it

We use this information, including to:

- Provide our services;
- Manage and administer our systems;
- Take payment from or give you a refund;
- Help us ensure that our customers are genuine and to prevent fraud;
- Personalise our service;
- Statistical analysis and research into our clients;
- Combine this information with other types of information mentioned above.

How long do we keep it

48 hours after the purchase unless you have provided your consent in which case we keep it for 2 years

6. Information that we collect incidentally from other sources or public sources, including:

- Information available in the media;
- Information presented on our social media timelines;

How we use it

We use this information, including to:

- Maintain market awareness;
- Build and maintain social media branding;

How long do we keep it

48 hours after the purchase unless you have provided your consent in which case we keep it for 2 years

7. Information that we collect from individuals representing organisations, including:

- Contact details of individuals working for organisations;
- Other personal information regarding such individuals.

How we use it

We use this information, including to:

- Build relationships with other organisations.

How long do we keep it

As long as there is a business relationship and up to 2 years after its termination

8. Information that you provide to us when applying for a job:

- Job, name, surname, email, phone number,
- Location, cv

How we use it

We use this information to assess your application for a job

How long do we keep it

24 months from the date of submission after providing your consent

9. Financial information such as:

- Invoices, payroll information, payment details, bank information and others

How we use it

We use this information to prepare our financial results, pay our taxes and manage our obligations towards partners, customers, suppliers, subcontractors, other processors and the tax and other authorities. We might transfer this information to our auditors or the authorities

How long do we keep it

6 years plus another 6 years if requested by the authorities.

10. Images and videos from our cctv system

How we use it

We use this information to secure our premises and to provide safety to you and our employees

How long do we keep it

30 days

11. Call center recordings

How we use it

We perform voice recording in order to provide better quality of service and to refer to your order in case there is a dispute on the order placed

How long do we keep it

72 hours

Why we collect and how long we keep your information

- We collect and use your information for a variety of reasons. We need some information to enter into and perform our contract – for example your contact and payment details.
- Some information processing is required by law due to our anti-fraud screening obligations or in the public interest such as making sure we verify our customers' identities.
- Some information is processed because you've given your consent to that, which can be withdrawn any moment by an electronic request sent at the contact point designated below.
- Other information we collect because we have legitimate business interests, for example, in:
 - Understanding how our customers use our products, services and websites;
 - Understanding and responding to customer feedback;
 - Researching and analysing the services our customers want;
 - Improving our services;
 - Receiving information from other entities in our group about shared customers;
 - Understanding the type of products and services our customers buy and how they use them;
 - Personalise our offers so we're better able to provide offers and ideas that are relevant to you;
- Maintaining a public profile on both traditional and social media;
- Providing security over our business and who we trade with; or

- Developing and maintaining relationships with vendors, partners and other companies and dealing with individuals who work for them.
- We will keep your information for as long as it is reasonably necessary as it has been previously described. It will depend on factors such as whether you have any outstanding purchases or an account with us or have interacted with recent offers. We will also routinely refresh our information to ensure we keep it up-to-date.

Other uses

Legal requirements

Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims. We will not delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

Information we share

There are certain circumstances where we may transfer your personal data to employees, contractors and to other parties.

With your consent, we may share information about you with other members of our group of companies (PHC) so we can provide the best service across our group.

We may also share your information with certain contractors or service providers only when it is necessary to execute a contract or we are legally obliged.

Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function.

We may also share your information with certain third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with. If we are not able to share information with certain third party partners who are also in our loyalty scheme, we will not be able to offer that service].

Your personal information may be transferred to other third party organisations in certain scenarios:

If we're discussing selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;

If we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you;

If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the police;

If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

Where your information will be held

When we share your information your information may be transferred outside the European economic area.

The transfer of this information is governed by a contract including standard contractual clauses (SCCs) approved by the European Commission.

We will only transfer data to jurisdictions outside the scope of the European General Data Protection Regulation (GDPR) where the appropriate safeguards set out in the GDPR are in place.

Your rights

You may have certain rights in relation to your information including a right to access or to correct the information we hold on you.

Other rights may be available in certain circumstances. Please see below more details about the rights that may be available and how you can get in touch with us.

data subject rights

We've listed the rights you have over your information and how you can use them below.

These rights will only apply in certain circumstances. They will generally not be available if there are outstanding contracts between us, if we are required by law to keep the information or if the information is relevant to a legal dispute.

You can remove consent, where you have provided it, at any time.

You can ask us to confirm if we are processing your information.

You can ask for access to your information.

You can ask to correct your information if it's wrong.

You can ask us to delete your information. You have a right to be forgotten and you can ask that our systems stop using your information.

You can ask us to restrict how we use your information.

You can ask us to help you move your information to other companies.

You can ask us to stop using your personal information, but only in certain cases.

You have the right to complain to the relevant supervisory authority.

How to contact us

If you have any questions about this policy please contact our data protection officer by email at dpo@phc.com.cy

Changes to the policy

This policy will be changed from time to time.

If we change anything important about this policy (the information we collect, how we use it or why) we will highlight those changes at the top of the policy and provide a prominent link to it for a reasonable length of time following the change.

Other policies

Cookies

We use cookies that identify your browser or device. They collect and store information when you visit our website [or app] about how you use it.

For more information about cookies, the types of cookies we use and how we use them please see our cookie policy.

Jobs

We are committed to keeping your application for a job safe.

For more information about the information we collect and how you use it in regards to jobs applications please refer to our jobs privacy policy.