

Franco Manca

Privacy Information - Privacy and Cookies Policy in

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PRIVACY AND COOKIES

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1. Introduction & General Terms

Franco Manca is the trading name of Franco Manca 2 UK Limited reg. 07045067

When we refer to “we” or “our” or “ Franco Manca” we are referring to Franco Manca 2 UK Limited or other subsidiary companies or group companies that we might have from time to time.

Franco Manca is committed to protecting your and your family's personal information when you are using Franco Manca services. We want our services to be safe and enjoyable for our customers. This Privacy and Cookies Policy relates to our use of any personal information we collect from you via the following services:

- any Franco Manca website that links to this Privacy and Cookies Policy;
- social media or official Franco Manca content on other websites;
- mobile devices and other Applications (“Apps”);

It also relates to our use of any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person when visiting our premises.

In order to provide you with the full range of Franco Manca services, we sometimes need to collect information about you.

This Privacy and Cookies Policy explains the following:

- what information Franco Manca may collect about you;
- how Franco Manca will use information we collect about you;
- when Franco Manca may use your details to contact you;
- whether Franco Manca will disclose your details to anyone else;
- your choices regarding the personal information you provide to us;
- the use of cookies on Franco Manca websites and how you can reject cookies

Franco Manca is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act 2018 and the European General Data Protection Regulation, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 repealing Directive 95/46/EC (these laws are referred to collectively in this Privacy and Cookies Policy as the “data protection laws”).

Franco Manca websites contain hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by cookies. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

2. When will Franco Manca collect information about me?

- When you visit our website, use your order and collect service to buy products, or redeem vouchers or rewards from Franco Manca in a restaurant or online.
- When you make an online purchase and check out as a guest (in which case we just collect transaction-based data).
- When you make an online delivery purchase through our current or future partners, like Uber Eats.
- When you join our online queue
- When you dine with us or purchase a product in a restaurant and don't have (or don't use) an account.
- When you engage with us on social media.
- When you download or install one of our current, or future, apps or software.
- When you join or participate in a current, or future loyalty programme.
- When you sign up to receive our newsletters and promotional correspondence.
- When you redeem any offers received from promotional channels.
- When you purchase or redeem a gift card or gift voucher.
- When you contact us by any means with queries, feedback, complaints etc.
- When you enter prize draws or competitions.
- When you book any kind of appointment with us or book to attend an event, for example master class pizza workshop or a table booking at a restaurant.
- When you use our online queuing system.
- When you choose to complete any surveys whether on our website or we have sent you, via email or in restaurant, or reviews on 3rd party websites where you have given your permission to share data with us.
- When you fill in any forms. For example, if an accident happens in a restaurant, Franco Manca may collect your personal data.
- When you have given a third party permission to share with us the information they hold about you.
- When you use our restaurants which usually have CCTV systems operated for the security of both customers and staff. These systems may record your image during your visit.
- When you apply for a job with Franco Manca or send in your curriculum vitae whether as a result of an available post or speculatively.
- When you buy or sell shares in Franco Manca or any group company.
- When you make a data subject access request.

3. What information will Franco Manca collect about me?

- If you join our virtual queue for a restaurant: your name, your telephone number, your party size, your location, and your wait and sit down time.
- If you book a table at one of our restaurants by calling or visiting one of our restaurants or through our booking service provided by “Bookatable” or any alternate supplier: your name, your email address, telephone number, booking details, such as booking location, booking time and number of covers.
- WIFI If you use our in-restaurant wifi service: your name, your email, telephone number, date of birth and browsing information, such as MAC address, browser type, device type, Log File Information; Log file information is automatically reported by your browser each time you access a web page. When you register with or use our WIFI Access, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such Information. Information gathered using cookies in your web browser. It is important for us to track how our WIFI Access is used, and we (or our service providers) may place “cookies” on your computer or device. Cookies are small data files that identify you when you use the restaurant WIFI, ‘order and collect’ ordering service or the Franco Manca website. You have the option to decline our cookies by using your browsers settings tools but this may affect some aspect of the services.
- If you have a ‘Order and collect’ account with us, which is provided by MyCheck and any alternate provider: your name, date of birth, payment details, billing/delivery address, orders, receipts, rewards earned or used, email and telephone number. We will also keep a log of your order history and all related transactional data, such as payment method, payment amount and items purchased. For your security, we’ll also keep an encrypted record of your login password/pin.
- Details of your visits to our websites or apps, and which site you came from to ours.
- Details of your social media profiles and postings.
- Payment card information to enable payment for services.
- Your comments, feedback and service reviews.
- Details of your share ownership in Franco Manca and its group companies.
- Your data subject access request and forms of identity provided.
- Your image may be recorded on CCTV when you visit one of our restaurants

Other than specified above we may receive personal information about you when you participate in, access or sign up to any of Franco Manca's products, services, activities or online content, such as newsletters, competitions, loyalty scheme, live chats, message boards, email and mobile notifications, telephone or text, book tickets for a Franco Manca event or create an account using Franco Manca's online systems including any Franco Manca Mobile Devices Applications. This can consist of information such as your name, email address, postal address, telephone or mobile number, gender or date of birth, as well as information collected about your use of Franco Manca products and services (such as when you last visited our premises, what pages you visit on Franco Manca website or app, items you have purchased, rewards earned or used and refer a friend activities).

If you are the parent or guardian of a child aged under 16, we may process limited personal data about you so you can give consent for the child to access some Franco Manca products or services. We may use your contact details to communicate with you about the child's account or use of services.

Please note that sometimes we will require you to provide additional personal information, and sometimes sensitive personal information. When we do this we will provide further information about why we are collecting your information and how we will use it.

Where we provide personalised services, we may ask your permission to review third party data about you, for example, your Twitter or Facebook feeds, to get to know you better and to provide more effective personalisation. Some of our services enable you to sign-in via a third party service, such as Facebook. If you choose to sign-in via a third party app, you will be presented with a dialog box which will ask your permission to allow Franco Manca to access your personal information (e.g. your full name, date of birth, email address and any other information you have made publicly accessible). Please note that any information that is not required by the particular service you have opted to use will not be retained by Franco Manca.

Franco Manca collects information about how you use Franco Manca mobile or other Apps, Franco Manca websites or other Franco Manca content online, and the device(s) you use to access the services. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet.

For more information, please see section 15 of this policy, on Franco Manca's use of cookies and similar technologies, and section 17, on information collected by Franco Manca when you use Franco Manca Apps on your mobile device.

4. How will Franco Manca use the information it collects about me?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you. In the case of loyalty scheme members, we'll also offer you relevant rewards.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'Your rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

Franco Manca will use your personal information for a number of purposes including the following:

- to provide our services, activities or online content, to provide you with information about them, to enable you to make payment for such services and to deal with your requests and enquiries;
- to provide responses to queries you raise with us;
- to provide you with user-friendly online navigation experience;
- to provide shareholder registry services;
- for "service administration purposes", which means that Franco Manca may contact you for reasons related to the service, activity or online content you have signed up for, as set out in section 6 below (e.g. to provide you with password/pin reminders, to notify you of certain actions that you have taken on your account, to notify you that a particular service, activity or online content has been suspended for maintenance, to notify you of updates to our Privacy and Cookies Policy or Terms of Use, to let you know if your Franco Manca account has become dormant and to ask if you would like to use it again before we close it);
- where we provide personalised services, we may analyse the information you supply, as well as your activity using our products and services, so that we can offer a more relevant, tailored service. For instance, we could use your website viewing history to provide personalised recommendations. If you are signed-in or subscribed to email newsletters, you will receive a personalised service. If you don't want to receive these services you can unsubscribe from email newsletters or disable personalisation. Please visit Your Account in the Franco Manca Preference Centre to find out more or follow instructions at the bottom of any marketing e-mails you have received from us;
- we may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes; and where Franco Manca proposes using your personal information for any other uses we will ensure that we notify you first;
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities;
- To comply with our contractual or legal obligations to share data with law enforcement; and

- Sometimes, we'll need to share your details with a third party who is providing a service (such as a table booking agent). We do so to maintain your booking. Without sharing your personal data, we'd be unable to fulfil your booking request.

5. Your Franco Manca Account

If you have registered for a Franco Manca account, this will allow you to login to the Franco Manca websites, online services and Apps. These services might be run by the Franco Manca or they could be run by our service providers e.g. MY CHECK (UK) LIMITED or ACTEOL SUPPORT SERVICES LIMITED or 5Loyalty Limited. To provide you with a seamless experience, it may be necessary to share your personal information between these organisations. We will only share what we need to in order to provide the service you are using.

You might be asked to use your Franco Manca Account on other Franco Manca services to enable you to sign in and seamlessly enjoy Franco Manca services.

Your Franco Manca account will always be covered by the policies of this website. But, please be aware that additional policies may apply if your Franco Manca account is linked to another account.

6. When will Franco Manca contact me?

Franco Manca may contact you:

- in relation to any service, activity or online content you have signed up for, in order to ensure that Franco Manca can deliver the services, e.g. to verify your email when you sign up for a Franco Manca account, or to help you reset your password/pin or to ask whether you agree to your child's request for access to certain Franco Manca services);
- in relation to any correspondence we receive from you or any comment or complaint you make about Franco Manca products or services;
- in relation to any table availability when you use our virtual online queue;
- in relation to any booking you have made or any food orders you have placed;
- in relation to any loyalty scheme you have signed up to;
- in relation to any gift cards purchased or held;
- in relation to any personalised services you are using;
- in relation to any communication you have submitted to Franco Manca, e.g. on Franco Manca message boards or feedback forms or via text or voicemail message;
- to invite you to participate in surveys about Franco Manca services (participation is always voluntary);
- to update you on any material changes to Franco Manca's policies and practices; and
- for marketing purposes, as set out in section 7.

7. Will I be contacted for direct marketing purposes?

Franco Manca will only send you marketing emails, texts, post or contact you on Franco Manca platforms or by phone where you have agreed to or requested this. We offer regular emails to let you know about Franco Manca products, services, news, offers and competitions. From time to time we may also contact you to ask your views on issues affecting Franco Manca. We may personalise the message content based upon any information you have provided to us and your use of Franco Manca products and services.

We may use information which we hold about you to show you relevant advertising on third party sites (e.g. Facebook, Google, Instagram, Snapchat and Twitter). This could involve showing you an advertising message where we know you have a Franco Manca account and have used Franco Manca products and services. If you don't want to be shown targeted advertising messages from Franco Manca, some third party sites allow you to request not to see messages from specific advertisers on their sites in the future.

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link or 'opt out' link or 'preference centre' link in any email communication that we send you. We will then stop any further emails from that particular source.
- If you have an account, log in into your Franco Manca account, visit the 'Account Information' area and change your preferences.
- In our apps, you can manage your preferences and opt out from one or all of the different push notifications by selecting or deselecting the relevant options in the 'Settings' section.
- Contact us using the contact details in section 18 below.

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

8. Will Franco Manca share my personal information with anyone else?

We will keep your information within the Franco Manca group of companies except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies, including for child protection reasons) or as described in this section and section 9.

Generally, we will use your information within Franco Manca and will only share it outside Franco Manca where you have requested it or given your consent. However, we may share with third party sites (e.g. Facebook, Google, Instagram, Snapchat and Twitter) some data, with appropriate security measures, to show you relevant advertising on third party sites, as set out in section 7.

Sometimes Franco Manca uses third parties to process your information on our behalf, for example to provide services (e.g. order and collect service or loyalty scheme) or analysis. Franco Manca requires these third parties to comply strictly with its instructions and Franco Manca requires that they do not use your personal information for their own business purposes, unless you have explicitly consented to the use of your personal information in this way.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the European Union such as Australia or the USA.

For example, this might be required in order to fulfil your order, process your payment details or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EU. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

9. What if I am a user aged under 16?

Protecting children's privacy online is extremely important to Franco Manca. Our online services are intended for general audiences and are not intended for children under the age of 14. Our online services may only be used by anyone aged 14 or over. When users identify themselves as being children (i.e. under the age of 16 but over the age of 14), we will in some circumstance obtain consent from parents for the collection, use, and sharing of their children's personal information (e.g. to participate in a Franco Manca Master Class or Loyalty Scheme).

We encourage the supervision of children's online activities including the use of for example parental control tools which are available online to help provide a child-friendly online environment. These tools can also prevent children from disclosing their name, address, and other personal information online without parental permission.

10. How long will Franco Manca keep my personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with Franco Manca. If you delete your Franco Manca account then your personal information is deleted immediately where such data is not required to be kept by law or tax purposes. When information is required to be kept by law or for tax reasons, we will hold such information for 6 full tax years or such longer periods if stipulated by relevant legislation or tax law. Any remaining information is anonymised for analytical purposes. For further information about deleting your Franco Manca account, please see section 11 below.

If you've not used your Franco Manca account or any Franco Manca online services for more than five years, it will be flagged as inactive and we'll contact you to ask whether you want to keep it open. Unless you reply to say 'yes' within the stipulated timeframe, we'll close the account and delete or anonymise the personal data associated with it unless such data include transactional data that is required to be kept by law or for tax purposes.

11. Can I delete my data?

If the data we hold about you is not required for us to fulfil a legal obligation, you can delete your personal data by contacting us by email at privacy@francomanca.co.uk or through our Contact Us form on our website.

As explained in section 10 above, deleting your Franco Manca account will erase any personal information in your account that we have about you, other than personal data that we are required to keep by law or tax law and it will mean any data we hold about how you have used Franco Manca products and services will be made anonymous.

12. Can I find out what personal information Franco Manca holds about me?

You have the right to request a copy of the personal information Franco Manca holds about you and to have any inaccuracies corrected. (We require you to prove your identity with 2 pieces of approved identification). We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files. If you are within the UK, please address requests and questions about this or any other question about this Privacy and Cookies Policy to the Data Protection Officer, 1st Floor, 50-51 Berwick Street, London W1F 8SJ.

Email: privacy@Francomanca.co.uk.

We will need two copies of forms of identification, which can be one of passport, driving licence or birth certificate together with one of utility bill (from last 3 months), current vehicle registration document, bank statement (from last 3 months) or rent book (from last 3 months).

13. Web browser cookies

a. What is a cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on Franco Manca website. However, you can change your cookie settings at any time.

On Franco Manca websites and Wi-Fi service, cookies record information about your online preferences and allow us to tailor our websites to your interests.

During the course of any visit to a Franco Manca website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

b. How does Franco Manca use cookies?

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience. It also helps us recognise when you are signed in to your Franco Manca account and to provide a more personalised experience. Franco Manca uses this type of information to help improve the services it provides to its users. Certain areas of Franco Manca websites may use cookies for a specific reason - for example, to help an online game work effectively on your device.

c. Franco Manca Sharing Tools

You will also see embedded 'share' buttons on Franco Manca web pages; these enable users to easily share content with their friends through a number of popular social networks. When you click on one of these buttons, a cookie may be set by the service you have chosen to share content through. Franco Manca does not control the dissemination of these cookies. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on Franco Manca website. However, you can change your cookie settings at any time.

d. Franco Manca cookies and how to reject cookies

Full information about how the Franco Manca uses cookies, and how to control what cookies are set on your device through the Franco Manca website, can be found on using Franco Manca.

It is important to note that if you change your settings and block certain cookies, you will not be able to take full advantage of some features of Franco Manca services, and we might not be able to provide some features you have previously chosen to receive.

e. Other information collected from web browsers

Your web browser may also provide Franco Manca with information about your device, such as an IP address and details about the browser that you are using. We use information provided by your browser or by the link that you have clicked to understand the webpage that directed you to Franco Manca Online and this may be captured by performance cookies.

If you have any concerns about the way that we use cookies or respect your settings, then please contact us at privacy@Francomanca.co.uk.

14. Apps and Devices

When you download or use Franco Manca apps on your mobile device, information may be accessed from or stored to your device. Most often this is used in a similar way to a web browser cookie, such as by enabling the app to 'remember' you or provide you with the content you have requested.

Your web browser, application or device may also provide the Franco Manca with information about your device, such as a device identifier or IP address or location of the device. Device identifiers may be collected automatically, such as the device ID, IP address, MAC address, IMEI number and app ID (a unique identifier relating to the particular copy of the app you are running).

When you sign in to a Franco Manca app, your sign-in details may be stored securely on the device you are using, so you can access other Franco Manca apps on the same device without needing to enter your sign-in details again.

If you have any concerns about the information which might be accessed from or stored on your device by the Franco Manca, you may wish to only access Franco Manca content through a web browser and review your web browser settings. Visit Using the Franco Manca (“How can I stop my internet browser tracking my info?”) for more information.

15. Changes to Franco Manca’s Privacy and Cookies Policy

This Privacy and Cookies Policy may be updated from time to time so you may wish to check it each time you submit personal information to Franco Manca. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use Franco Manca websites to submit personal information to Franco Manca. You can also delete your Franco Manca account at any time – please see section 12 for details. If material changes are made to the Privacy and Cookies Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

16. Your Rights

Here is a list of the rights that all individuals have under data protection laws. They don’t apply in all circumstances. If you wish to use any of them, we’ll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018:

- The right to be informed about the processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the “right to be forgotten”);
- The right to request access to your personal information and to obtain information about how we process it;

- The right to move, copy or transfer your personal information (“data portability”); and
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

17. Compromise of Personal Information.

If personal information is compromised because of a breach of security, the Company will promptly notify those persons whose personal information has been compromised, by email notice, or as otherwise required by applicable law.

18. Contacting Franco Manca about this Privacy and Cookies Policy

If you any questions or comments about this Privacy and Cookies Policy please contact: The Data Protection Officer

Address: Franco Manca 2 UK Limited, 1st Floor, 50-51 Berwick Street, London W1F 8SJ

Email: privacy@francomanca.co.uk