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| LAH KOH PRIVACY POLICY | | |
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| **INTRODUCTION**  Welcome to Lah Koh’s privacy notice. We respect your privacy and are committed to protecting your Personal Data. This Privacy Notice will inform you as to how we look after your Personal Data when you visit https://www.lahkoh.co.uk (our “**Website**”) and tell you about your privacy rights and how the law protects you.  **1. IMPORTANT INFORMATION AND WHO WE ARE**  **PURPOSE OF THIS PRIVACY NOTICE**  This Privacy Notice aims to give you information on how Lah Koh collects and processes your Personal Data through your use of the Website, including any data you may provide when you enquire about our business, subscribe to our newsletter, participate in one of our events or correspond with us.  **CONTROLLER CONTACT DETAILS**  Under current Data Protection Legislation (the General Data Protection Regulation 2016/679 (“GDPR”) and the Data Protection Act 2018) the data controller is Lah Koh.  If you have any questions about this Privacy Notice, including any requests to exercise your legal rights (see section 9 below), please contact us using the details set out below:  Full name of legal entity: Vasco Restaurant Ltd  Email address: [hello@lahkoh.co.uk](mailto:hello@farmerj.com)  Postal address: 17-19 Fisherton Street, Salisbury, Wiltshire, UK.  You have the right to make a complaint at any time to the supervisory authority for data protection issues, the Information Commissioner’s Office of the United Kingdom (<https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.  **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**  We keep our Privacy Notice under regular review. Any changes we make to this Privacy Notice in the future will be uploaded to the Websites. Please check back frequently to see any updates or changes to our Privacy Notice. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.  **THIRD-PARTY LINKS**  The Websites may include links to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.  **2. THE DATA WE COLLECT ABOUT YOU**  “**Personal Data**” means any information relating to an identified or identifiable natural person: an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity. It does not include data where the identity has been removed.  We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:  **• Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.  **• Contact Data** includes billing address, email address, telephone and fax numbers.  **• Financial Data** includes bank account, payment card details and tax information.  **• Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, and other technology on the devices you use to access this Website.  **• Profile Data**includes details of any purchases or orders made by you, any queries, comments, or complaints you send us in relation to our business relationship.  **• Usage Data** includes information about how you use our Website.  **• Marketing and Communications Data**includes your preferences in receiving marketing from us and our third parties and your communication preferences.  Unless we obtain your informed consent or it is otherwise required by law or in connection with a contract we have with you, we do not collect any **Special Categories of Personal Data**, nor do we collect any information about criminal convictions and offences.  **IF YOU FAIL TO PROVIDE PERSONAL DATA**  Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.  **3. HOW IS YOUR PERSONAL DATA COLLECTED?**  We use different methods to collect data from and about you including through:  **• Direct interactions.** You may give us your Identity, Contact, Marketing and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:  • apply for our products or services;  • subscribe to our service or publications;  • request marketing to be sent to you; or  • give us feedback or contact us by phone, email, or any other means of communication.  **• Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns.  **• Third parties or publicly available sources.** We will receive personal data about you from various third parties, including search information providers such as Google. We may also receive your Contact, Financial and Transaction Data from providers of technical, payment and delivery, and your Identity and Contact Data from our business partners.  **4. HOW WE USE YOUR PERSONAL DATA**  We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances (each known as a “lawful basis”):  • Where we need to **perform the contract** we are about to enter into or have entered into with you.  • Where we need to **provide you with assistance** in relation to your queries.  • Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.  • Where we need to comply with a **legal obligation**, for example we may process your Identity, Contact, and Financial Data to comply with laws on money laundering prevention and crime or financing terrorism processes.  Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will obtain your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [hello@](mailto:hello@farmerj.com)lahkoh.co.uk  We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose.  **Purpose/Activity**    **Type of data**    **Lawful basis for processing including basis of legitimate interest**    **To register you as a new customer**    **(a) Identity**  **(b) Contact**    **Performance of a contract with you**    **To process and deliver our services including:**  **(a) Manage payments, fees and charges**  **(b) Collect and recover money owed to us**    **(a) Identity**  **(b) Contact**  **(c) Financial**  **(d) Transaction**  **(e) Marketing and Communications**    **(a) Performance of a contract with you**  **(b) Necessary for our legitimate interests (to recover debts due to us)**    **To manage our relationship with you**  **(a) Identity**  **(b) Contact**  **(c) Profile**  **(d) Marketing and Communications**    **(a) Performance of a contract with you**  **(b) Necessary to comply with a legal obligation**  **(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)**    **To administer and protect our business and the Websites**    **(a) Identity**  **(b) Contact**  **(c) Technical**  **(d) Usage**    **(a) Necessary for our legitimate interests (for running our business, network security, to prevent fraud)**  **(b) Necessary to comply with a legal obligation**    **To use data analytics to improve our Websites, products/services, marketing, customer relationships and experiences**    **(a) Technical**  **(b) Usage**    **Necessary for our legitimate interests (to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)**    **To make suggestions and recommendations to you about products or services that may be of interest to you**    **(a) Identity**  **(b) Contact**  **(c) Technical**  **(d) Usage**  **(e) Profile**  **(f) Marketing and Communications**    **Necessary for our legitimate interests (to develop our products/services and grow our business)**    **MARKETING AND PROMOTIONAL OFFERS**  We may use your Identity, Contact, Technical, Usage, Profile and Recruitment Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased our services and you have not opted out of receiving that marketing. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.  **OPTING OUT**  You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase, warranty registration, product/service experience or other transactions.  **CHANGE OF PURPOSE**  We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.  **5. DISCLOSURES OF YOUR PERSONAL DATA**  We may share your personal data with the parties set out below, for the purposes set out in the “Purposes for which we will use your personal data” table above:  • Business partners where doing so is necessary for the performance of our contractual relationship with you  • Service providers who provide Lah Koh with IT and system administration services  • Professional advisers including lawyers, bankers, auditors and insurers  • HM Revenue & Customs (United Kingdom), regulators and other authorities  • any third parties to whom we may choose to sell, transfer or merge parts of the Lah Koh business or assets.  We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes, and only permit them to process your personal data for specified purposes and in accordance with our instructions.  **6. INTERNATIONAL TRANSFERS**  We may share your personal data with partners outside of the European Economic Area (“**EEA”**), when doing so is necessary for the purposes mentioned in this Privacy Notice. Whenever we transfer Personal Data out of the EEA, we adhere to the protections for international transfers approved by the European Commission. Please contact us if you want further information on the specific transfer mechanism.  **7. DATA SECURITY**  We have put in place appropriate security measures 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. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator if we are required to do so.  **8. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**  We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.  To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.  Please contact us using the contact details set out in this Privacy Notice if you have any questions regarding Data Retention.  **9. YOUR LEGAL RIGHTS**  Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. If you wish to exercise any of your legal rights, please contact us using the contact details set out in this Privacy Notice.  You have the right to:  **• Request access**to your Personal Data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.  **• Request correction**of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.  **• Request erasure**of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.  **• Object to processing**of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.  **• Request restriction of processing**of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) If you want us to establish the data’s accuracy; (b) Where our use of the data is unlawful but you do not want us to erase it; (c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and  (d) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.  **• Request the transfer**of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.  **• Withdraw consent at any time**where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.  **NO FEE USUALLY REQUIRED**  You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We will notify you if this is the case at the time  **WHAT WE MAY NEED FROM YOU**  We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.  **TIME LIMIT TO RESPOND**  We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.  **EXCEPTIONS**  It may not be possible for us to delete your Personal Data if we are required to keep it by law or if we hold it in connection with a contract with you. Similarly, access to your Personal Data may be refused if making the information available would reveal Personal Data about another person or if we are legally prevented from such disclosure. | | |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| **To register you as a new customer** | **(a) Identity**  **(b) Contact** | **Performance of a contract with you** |
| **To process and deliver our services including:**  **(a) Manage payments, fees and charges**  **(b) Collect and recover money owed to us** | **(a) Identity**  **(b) Contact**  **(c) Financial**  **(d) Transaction**  **(e) Marketing and Communications** | **(a) Performance of a contract with you**  **(b) Necessary for our legitimate interests (to recover debts due to us)** |
| **To manage our relationship with you** | **(a) Identity**  **(b) Contact**  **(c) Profile**  **(d) Marketing and Communications** | **(a) Performance of a contract with you**  **(b) Necessary to comply with a legal obligation**  **(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)** |
| **To administer and protect our business and the Websites** | **(a) Identity**  **(b) Contact**  **(c) Technical**  **(d) Usage** | **(a) Necessary for our legitimate interests (for running our business, network security, to prevent fraud)**  **(b) Necessary to comply with a legal obligation** |
| **To use data analytics to improve our Websites, products/services, marketing, customer relationships and experiences** | **(a) Technical**  **(b) Usage** | **Necessary for our legitimate interests (to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)** |
| **To make suggestions and recommendations to you about products or services that may be of interest to you** | **(a) Identity**  **(b) Contact**  **(c) Technical**  **(d) Usage**  **(e) Profile**  **(f) Marketing and Communications** | **Necessary for our legitimate interests (to develop our products/services and grow our business)** |

**MARKETING AND PROMOTIONAL OFFERS**

We may use your Identity, Contact, Technical, Usage, Profile and Recruitment Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased our services and you have not opted out of receiving that marketing. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase, warranty registration, product/service experience or other transactions.

**CHANGE OF PURPOSE**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

**5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below, for the purposes set out in the “Purposes for which we will use your personal data” table above:

* Business partners where doing so is necessary for the performance of our contractual relationship with you
* Service providers who provide Farmer J with IT and system administration services
* Professional advisers including lawyers, bankers, auditors and insurers
* HM Revenue & Customs (United Kingdom), regulators and other authorities
* any third parties to whom we may choose to sell, transfer or merge parts of the Farmer J business or assets.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes, and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**6. INTERNATIONAL TRANSFERS**

We may share your personal data with partners outside of the European Economic Area (“**EEA”**), when doing so is necessary for the purposes mentioned in this Privacy Notice. Whenever we transfer Personal Data out of the EEA, we adhere to the protections for international transfers approved by the European Commission. Please contact us if you want further information on the specific transfer mechanism.

**7. DATA SECURITY**

We have put in place appropriate security measures 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. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator if we are required to do so.

**8. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Please contact us using the contact details set out in this Privacy Notice if you have any questions regarding Data Retention.

**9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. If you wish to exercise any of your legal rights, please contact us using the contact details set out in this Privacy Notice.

You have the right to:

* **Request access**to your Personal Data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
* **Request correction**of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
* **Request erasure**of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
* **Object to processing**of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
* **Request restriction of processing**of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) If you want us to establish the data’s accuracy; (b) Where our use of the data is unlawful but you do not want us to erase it; (c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and  (d) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
* **Request the transfer**of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
* **Withdraw consent at any time**where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We will notify you if this is the case at the time

**WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

**TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**EXCEPTIONS**

It may not be possible for us to delete your Personal Data if we are required to keep it by law or if we hold it in connection with a contract with you. Similarly, access to your Personal Data may be refused if making the information available would reveal Personal Data about another person or if we are legally prevented from such disclosure.