

PRIVACY AND COOKIE POLICY

PRIVACY POLICY

Last updated July 02, 2020

Introduction

Bones & Burke Ltd (we) are committed to protecting your personal data and respecting your privacy.

This policy (together with our terms and conditions as referenced within the App and any additional terms of use they incorporate applies to your use of the Glug mobile application software (**App**) once you have downloaded or streamed a copy of the App onto your device.

This notice sets out what personal data we collect about you and why and our legal basis for doing so, along with giving you information about your rights in relation to it and other information.

We hope you enjoy our App, which allows you to order food and drinks at your favourite bars and restaurants (**Venues**).

This App is **not intended for children** and we do not knowingly collect data relating to children.

You should read this notice carefully so you can understand our practices regarding your personal data and how we will treat it.

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Who we are and how to contact us

Bones & Burke LTD, a company registered in England with company number 10968653 with its registered address at 23 Providence Crescent, Hull, United Kingdom, HU4 6EF is the data controller and is responsible for your personal data (collectively referred to as **Company, we, us or our** in this policy).

You can contact us as follows:

- Writing to us as our registered office
- Emailing us at Support@Glug.live

Personal data we collect about you

We will collect and process the following data about you:

- **Information you give us.** This is information you give us when you create an account, make purchases through the App and undertake any activity on your account. This information includes your name, age, contact details, profile picture, payment card information, order details, any details you provide to us in correspondence, your marketing preferences, any information you share via the App's social media functions and any feedback you leave through the App.
- **Information we collect about you and your device automatically.** Each time you use the App we will automatically collect personal data including the type of mobile device you use, information stored on your device including your login information (if you have asked us to remember you), photos or other digital content, check ins, details of how you use the App, traffic data and communication data. We collect this data using cookies and other similar technologies. Please click here to see more information on cookies.
- **Location Data.** We make use of GPS technology to determine your current location so that we can identify Venues near you. The App will ask you to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings. If you do not consent to us using GPS technology to determine your location you can search for Venues by address instead.
- **Information we receive from other sources.** We will receive personal data about you from various third parties including location data from Google Maps, information that identifies your device from analytics providers (such as Google), advertising networks, data about your transactions through the App from providers of technical and payment service providers.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but does not identify you (directly or indirectly). For example, we may aggregate personal data of users to identify demographic trends for orders or Venues or to calculate the percentage of users accessing a specific App feature.

We do not collect any special category personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we use your personal data

We will use your personal data as follows:

- To install the App and register your account
- To process your orders and manage your account
- To enable us to respond to your requests and questions and generally manage our relationship with you such as telling you about changes to the App
- To enable you to provide feedback about our services or Venues
- To deliver content and advertisements to you
- To offer customer support and fix problems
- To administer and protect our business by fixing problems, data analysis and system testing
- To provide you with information you have requested
- To monitor trends and improve the App
- We will only send you direct marketing communications by email, text or push notification if we have your consent. You have the right to withdraw that consent at any time by contacting us at Privacy@Glug.live or you can opt out of direct marketing communications at any time by changing your marketing preferences within the App or by clicking on the unsubscribe link in the relevant email. We will not share your personal data for marketing purposes with third parties unless you give us your consent to do so.

Our legal basis for using your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- 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 or regulatory obligation.

Who do we share your personal data with?

To deliver our services and run our business we need to share some of your personal data with third parties as set out below:

- Venues you order food or drink from to enable us to perform our contract with you.
- service providers (who deal with it on our instructions) who provide IT and system administration services, support services and marketing services and providers of payment processing.
- professional advisers who provide services to us and legal or taxation authorities

We may also share your personal data with third parties to whom we sell, transfer or merge our business with, or, if we buy other businesses. Any new owners may use your personal data in the same way as set out in this privacy notice.

When we use third parties to process your personal data we make sure we have appropriate agreements in place with them to protect your personal data and to ensure your rights relating to it are honoured.

We share your personal data as set out above either because we need to in order to perform our contract with you, because we have a legitimate interest in doing so that is not overridden by your rights as an individual, for the purposes of compliance to any legal or taxation authority, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend our legal rights.

Your legal rights

You have a number of legal rights relating to your personal data.

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.

Request for your personal data we hold to be rectified. 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. 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 our lawful basis for processing it is our or a third party's legitimate interest. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object to our processing of your personal data for direct marketing purposes.

Request restriction of processing your personal data. This enables you to ask us to stop processing your personal data if: i) you want us to establish the accuracy of the data, ii) where our use of the data is unlawful but you do not want us to erase it, iii) 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, or iv) you have objective to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer or your personal data to you or a third party. This only applies to automated information you provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent. If we are using your personal information on the basis of your consent, you can withdraw it at any time by contacting us at Privacy@Glug.live. Any processing of your personal data before you withdraw your consent will still be lawful.

You can read more about your rights in relation to your personal information by visiting the Information Commissioner's website [here](https://ico.org.uk/).

You can exercise any of these rights at any time by contacting us at Privacy@Glug.live.

Complaints to supervisory authority

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues or other competent supervisory authority of an

EU member state if the App is downloaded outside the UK. You can contact the ICO through their website <https://ico.org.uk/>.

International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

How we will protect your personal data

All information you provide to us is stored on our secure servers. Any payment transactions carried out by our chosen third-party provider of payment processing services will be encrypted using SHA-256 SSL certificates with TLS version 1.2 or higher; Ciphers such as RC4 and DES and more advanced ciphers, such as AES and GCM. Where we have given you (or where you have chosen) a password that enables you to access the App you are responsible for keeping this password confidential and you should not share it with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way using firewall and SSL technology.

We will collect and store personal data on your Device using application data caches.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

How long we will keep your personal data

We will keep your personal data for as long as we need it to fulfil the purposes we collected it for as set out in this privacy notice and for the purpose of satisfying any legal, accounting or reporting requirements that apply to us. By law we have to keep some basic information about our customers for six years after the stop being customers.

When deciding how long to keep your personal data for we consider the amount, nature and sensitivity of the personal data, the potential harm to you from its disclosure, the purposes we process it for and whether we can achieve those purposes by other means.

Cookies

This section explains how we use cookies and similar technologies to recognize you when you visit our website or use at <https://glug.live/>, ("**Website**"). It explains what these technologies are and why we use them, as well as your rights to control our use of them.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by us are called "first party cookies". Cookies set by other parties are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the Website or through your use of the App (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognize your computer or device both when it visits the Website and also when it visits certain other websites.

In some cases we may use cookies to process your personal data, or that becomes personal data if we combine it with other information. If we do this we will deal with it in accordance with our privacy notice.

Why do we use cookies?

We use first and third party cookies for several reasons. Some cookies are required for technical reasons in order for our Website to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Website and the Glug App. Third parties serve cookies through our Website for advertising, analytics and other purposes. This is described in more detail below.

The specific types of first and third party cookies served through our Website and the purposes they perform are set out below.

How can I control cookies?

You have the right to decide whether to accept or reject cookies. You can use your web browser's cookie settings to block some or all cookies.

However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you.

Analytics and customization cookies:

These cookies collect information that is used either in aggregate form to help us understand how our Website is being used or how effective our marketing campaigns are, to deliver relevant advertising content to you or to help us customize our Website for you.

Cookies we use:

Details of the cookies we use are as follows:

Name: `__utmb#`

Purpose: Used by Google analytics to compute the duration a website is visited using the exact time that a user accesses a website. This is a HTTP cookie that expires after the session.

Provider: `.glug.live`

Service: Google Analytics [View Service Privacy Policy](#)

Country: United States

Type: `http_cookie`

Expires in: 30 minutes

Name: `__utmz#`

Purpose: Uses Google Analytics to gather location details for the website visitors, the clicked link, the search term, and the search engine that was used. This cookie is a HTTP type that lasts for 6 months.

Provider: .glug.live

Service: Google Analytics [View Service Privacy Policy](#)

Country: United States

Type: http_cookie

Expires in: 5 months 30 days

Name: __utma#

Purpose: Used by Google Analytics to record the number of times a visitor accessed the website as well as the dates for the first and recent visit. It is a HTTP cookie and expires in 2 years.

Provider: .glug.live

Service: Google Analytics [View Service Privacy Policy](#)

Country: United States

Type: http_cookie

Expires in: 1 year 11 months 29 days

Name: __utmt#

Purpose: Used to control the speed of requests to the website's server. Expires after the session and is a

Provider: .glug.live

Service: Google Analytics [View Service Privacy Policy](#)

Country: United States

Type: http_cookie

Expires 10 minutes
in:

Name: __utmc#

Purpose: The cookie registers the timestamp a user leaves a website to help calculate the duration of time spent on it using Google Analytics. The cookie activity lasts during the browsing session. It is a HTTP cookie type.

Provider: .glug.live

Service: Google Analytics [View Service Privacy Policy](#)

Country: United States

Type: http_cookie

Expires in: Session

Third party links

Our App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy notices, which you should read carefully as we are not responsible for the content or privacy practices of these third parties. We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services.

Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. If we change our privacy notice we will notify you when you next start the App. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App.

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 our relationship with you.