



## Privacy Policy

### **Copia Green DATA Privacy Statement**

#### **Who we are?**

This is the Data Privacy Statement of Master Delta Limited with head office based at Delta Retail Park, Ballysimon Rd, Limerick, phone number +353 (061) 411 522. We operate a restaurant under the brand name Copia Green based in Limerick at Park Point, Dublin Road in Castletroy.

#### **About This Statement**

This Data Privacy Statement is designed to demonstrate our firm commitment to privacy, our compliance with the General Data Protection Regulation (GDPR) and to inform you of the personal data that we collect and process in connection with your interaction with Copia Green.

It also sets out details of what personal data we process, why we process it, with whom your personal data is shared, and a description of your rights with respect to your personal data

#### **Personal Data Processed**

The personal data we hold, process and retain will be used for the management of your account, for administrative purposes, for meeting our legal and regulatory obligations and for marketing, where you give consent. We hold it and use it to protect your rights and interests and to manage our relationship with you appropriately, effectively and lawfully. At the same time, it enables us to run our business.

Where there is a need to process your data for a purpose other than those set out in this Data Privacy Statement, or otherwise outlined to you, we will inform you of this and, if required, we will seek your consent.

For sales transactions made online or over the phone, we collect your name, phone number, email address, billing and delivery address. We aim to process your credit card details at the



point of sale, in which case we do not retain your credit card details. In some cases, credit card details are stored to guarantee a reservation. These are stored securely and deleted as soon as they are no longer required.

Payments on or relating to this website are made through our third party payment gateway Global Payments. This systems use a combination of both established and innovative techniques to ensure the security and integrity of all sensitive data. The transfer of credit card details from Copia Green to Global Payments is encapsulated using encryption and digitally-signed protocol to ensure that the information passed is 100% secure and tamper-proof.

Through the contact form on our website, we collect your name, email address and a message. This is processed within our secure email system, where access to your details will be restricted to only those who need to deal with your query.

We have an email list, which we use to send a regular newsletter with information about products and offers. We always seek your explicit consent to be placed on this list and you can unsubscribe at any time.

We may also use your personal data to contact you in relation to customer surveys and questionnaires, but will only do so if you have consented to be contacted by us for these purposes.

Where appropriate, we may also use your personal data to enable the transfer of information for the purpose of debt collection.

We use social media, including Facebook, Twitter and Instagram. From time to time we run competitions and promotions, but we do not collect personal data.

### **Retention Time**

We hold onto sales transaction data for customers who are account holders for a period of five years in order to provide them with a detailed purchase history. Once a customer holding an account has been inactive for over five years, all their personal data is deleted. For sales made as one-time purchases, we retain the personal data relating to sales



transaction data for five years only. Your personal data on our marketing list is retained until you withdraw consent.

### **How is your Personal Data Shared?**

Your personal data may be disclosed to third parties where we are legally obliged to do so. It will also be disclosed during activities where we have lawful contractual agreements in place that enable us to operate our business.

Below is a list of third party software providers with whom we share personal data:

- SendInBlue (email marketing)
- Gmail (email and document storage)
- MyHost.ie (website host)
- Facebook & Instagram (advertising)
- Global Payments (payments)

All software providers we work with are either fully compliant or working diligently to ensure compliance.

### **Subject Access Requests**

You have the following rights under data protection law;

- **Information Request.** The right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data.
- **Regulator Complaint.** The right to complain to the Data Protection Commissioner in relation to the personal data that we hold about you, together with other information about our processing of that personal data.
- **Update Data.** The right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update your data such that it is complete.
- **Data Deletion.** The right, in certain circumstances, to request that we erase your personal data.



- **Restrict Processing.** The right to object to our use of your personal data or the way in which we process it.
- **Object to Processing.** The right, in certain circumstances, to request that we no longer process your personal data for particular purposes.
- **Data Portability.** The right, in certain circumstances, to transfer your personal data to another organisation.
- **Review Automated Decisions.** The right to object to automated decision making and/or profiling.

We fulfill all subject access requests within one month, where possible. In situations where requests are complex, we may need more time, but we will notify you of the delay within one month and will not take longer than two months in total. There are also situations where we cannot supply the personal data, and if this arises we will inform you and give a full explanation.

If you have a request, please contact Chris Towers by email at [chris@masterchefs.ie](mailto:chris@masterchefs.ie) or you can contact us in writing at Copia Green, Masterchefs Hospitality, Building 7, Delta Retail Park, Ballysimon Rd, Garryglass, Limerick, V94 HD63

You must provide a copy of identification such as a driver's license or passport, and if you require that we reply by post, you must include a copy of a utility bill from within the last six months to provide proof of your postal address.

You also have the right to complain to the Data Protection Commissioner if you are not satisfied with how Copia Green has dealt with your Subject Access Request.

## **Security**

Master Delta Limited processes the personal data of our customers in a proper manner and we are committed to taking appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorized destruction of such Data. The personal data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated.



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.

### **Data Breach Management**

We fully comply with GDPR requirements in relation to data breach management. We commit to report these within 72 hours to the Data Protection Commissioners, to inform affected data subjects as soon as possible, to log all breaches internally and put corrective action in place to ensure that they do not reoccur.

### **Children Under 16**

Under no circumstances may persons under the age of 16 use this website without the consent of a parental authority.

### **Changes to this Privacy Statement**

Copia Green reserves the right to make changes to this privacy statement at any time by giving notice to its users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. This Privacy Statement was last updated on 8/10/2018.