

## Wells & Co Privacy Notice

### Cookies & Privacy

Last Updated: January 2023



This Privacy Policy ("Policy") describes the personal information practices of Charles Wells Ltd, including in the UK, Wells & Co, and Brewpoint (known for the purposes of this policy collectively as "Charles Wells") with respect to information about our customers and others who visit our pubs, websites and mobile apps, including the types of personal information we collect, how we may use this information, and with whom we may share it.

Please note that many Wells & Co Pub Partner pubs/sites are owned and operated by pub partners, who are independent businessmen and women. This Privacy Policy does not apply to those pub partners, or to websites or mobile apps operated by them. Please refer to the privacy notices of such pub partners for information on their practices with respect to personal information.

### 1. Information We Collect

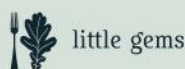
We may collect personal information about you when you visit one of our sites, use one of our Websites ("Sites"), or use our web or mobile device applications ("Mobile Apps") including those operated on our behalf by third parties. We refer to our Sites and Apps collectively as "Online Services".

The types of personal information we collect may include:

- Transaction information, such as product purchased, price, method of payment and payment details.
- Personal details such as name, postal address, email address, phone number, date of birth, age, gender, employment status, demographics and other contact information when you provide that information to us, such as if you register with our Online Services, enter a contest, competition, prize draw, or sweepstakes.
- Account information, such as username, password, and other identifiers or credentials used to access our Online Services or to acquire Charles Wells' products and services.
- Other personal information you choose to provide when you interact with Charles Wells.

The circumstances in which you provide personal information may include when you:

- purchase our products;
- register to use our Online Services;
- request to receive marketing or other communications; use our Wi-Fi networks;
- submit information in relation to public health or governmental monitoring schemes;
- enter in one of our contests, competitions, prize draws, or sweepstakes; submit information when providing feedback; or
- use interactive features of our Online Services.



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## Information Collected Through Automated Means

We may collect information from your computer system or mobile device through automated technologies when you visit our sites or use our Online Services or in-pub/site technologies. These automated technologies may include cookies, local shared objects, and web beacons. Additional information regarding the use of cookies and other automated technologies is provided in this Policy below. The information we collect may include your Internet Protocol (IP) address; computer/mobile device operating system and browser type; type of mobile device; mobile device settings; the unique device identifier (UDID) or mobile equipment identifier (MEID) for your mobile device; device and component serial numbers; advertising identifier (e.g., IDFAs and IFAs) or similar identifier; the referring website or application; the linked sites, third-party websites, applications or social media where you share Online Services content; and activity related to your use of our Online Services such as the pages you visit on our Sites or in our Mobile Apps.

The providers of third-party apps, tools, widgets and plug-ins on our Online Services, such as Facebook "Like" buttons, also may use automated means to collect information regarding your interactions with these features. This information is subject to the privacy policies or notices of these providers.

## Location Information

Charles Wells Online Services and in-pub/site technologies may collect precise information about the location of your mobile device or computer using geolocation and location presence awareness technologies such as GPS, Wi-Fi, Bluetooth, or cell tower proximity. For most mobile devices and computer systems, you can withdraw your permission for Charles Wells to acquire this information on your location through your device or Web browser settings. If you have questions about how to disable collection of precise location information, we recommend you contact your mobile device service provider, the device manufacturer, or your Web browser provider. Please note that certain Online Services and in-pub/site technologies may not function properly without precise location information. If you would like us to delete location information we may have collected that is specific to you, please contact us at the email or postal address listed below. Please note that we may be required by law to retain certain information. Some services within our pubs/sites are provided by third parties on our behalf and in those instances, contact should be directed to them. This will be declared by them at the point you register for their services.

## Combined Information

We may combine personal information that we collect with information we receive from other sources, information about your prior transactions with Charles Wells and information that is automatically collected.



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## **2. How We Use the Information We Collect**

Charles Wells may use the personal information we collect to:

- fulfil your requests or orders and process payments for our products and services (which may include sharing data on a highly secure basis with payment providers in the United States in accordance with section 10 below);
- if you give us permission, communicate with you about products and services of Charles Wells communicate with you about and administer your participation in contests, competitions, prize draws, sweepstakes, offers, promotions or special events; send communications to you about your orders, purchases or accounts with Charles Wells;
- send information to your contacts or third parties if you request us to do so;
- provide customer support, respond to, and communicate with you about your requests, questions and comments;
- enable you to post and interact with Charles Wells through social media; personalise your experience on our Online Services and in-pub/ site technologies, such as providing you with content in which you may be interested, and making navigation to our Sites and Mobile Apps easier;
- perform data analytics, including consumer research, trend analysis, and financial analysis;
- operate, evaluate and improve our business, including the development of new products and services; determination of the effectiveness of our sales, marketing and advertising efforts; and analysis and improvement of our products, offers, promotions, and Online Services and other technologies; protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with applicable law.

We may use automated information for purposes such as to (i) personalise the visitor experience in our sites or on our Online Services, (ii) deliver content (including advertising) tailored to our users' interests and the manner in which our users browse our Online Services or in-pub/site technologies, and (iii) manage our business. We may also use this information to help diagnose technical and service problems; administer our Online Services; identify users of our Online Services; identify a device for fraud prevention purposes, to target advertising or to personalise users' experiences; comply with legal obligations or public health policies; and gather demographic information about our users. We may also use automated information to determine usage patterns and how we may tailor our Online Services to better meet the needs of our users.

## **3. How We Share the Personal Information We Collect**

Charles Wells does not sell or otherwise share personal information about you, except as described in this Privacy Policy. Charles Wells may share personal information within the Charles Wells Group. The Charles Wells Group includes Charles Wells France but may also extend to our Pub Partners. Members of the Charles Wells Group that receive this information from Charles Wells are not authorised to use or disclose the information except as provided in this Privacy Policy.



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Charles Wells may share personal information with suppliers that provide services to Charles Wells, such as fulfilling orders, providing data processing and other information technology services, operating Online Services, administering promotions, contests, prize draws and sweepstakes, sending you marketing or other communications, conducting research and performing analytics, and personalising individual Charles Wells experiences. We do not authorise these vendors to use the personal information or to disclose it for any purpose other than to perform services on our behalf and where necessary will ensure that they direct you to their own privacy policy should it differ from our own at the appropriate point.

Circumstances may arise where, whether for strategic or other business reasons, Charles Wells decides to sell or transfer all or a portion of our business. We may transfer or grant access to information we have collected and stored, including personal information, to the party or parties involved in the transaction as part of that transaction under suitable conditions of confidentiality.

Charles Wells reserves the right to use or disclose personal information as needed to satisfy any law, regulation or legal request, to protect the integrity of our Online Services and in-pub/site technologies, to bring or defend against legal claims, to protect the rights, interests, safety and security of Charles Wells, Charles Wells employees or Pub Partners, or members of the public, or in connection with the investigation of fraud, illegal activity or violation of Charles Wells policy.

#### **4. Your Choices**

If you have opted-in to marketing communications, you can subsequently elect not to receive marketing communications from Charles Wells or third parties appointed to deliver these on our behalf by following the opt-out instructions in the marketing communications we send you or contacting us at the address or email address provided below. Please note that if you opt out of receiving marketing communications from us, we may still send communications to you concerning your transactions or enquiries, accounts with Charles Wells and any contests, competitions, prize draws, or sweepstakes in which you have enrolled.

#### **5. Access to and Correction and Deletion of Personal Information**

If at any time you would like to access, correct, or delete personal information we have collected from you, please contact us at the postal address or email address below. Where appropriate, including whenever required by applicable law, we will comply with your request within a reasonable time. Please note that we may be required by law to retain certain information. Before Charles Wells is able to provide you with any information or correct any inaccuracies, we may ask you to verify your identity and/or provide other details to help us respond to your request.



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## **6. Cookies and Similar Technologies**

Charles Wells use cookies and other similar technologies to collect information for the purposes described in this Privacy Policy under "How We Use the Information We Collect."

### Cookies

A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. Like most websites, Charles Wells uses cookies for a variety of purposes in order to improve your online experience. For example, we may track the total number of visitors to our Sites on an anonymous aggregate basis. We may also employ cookies so that we remember you when you return to the Site, to keep track of the items in your shopping cart if you purchase merchandise online, to administer certain contests and sweepstakes and to help customise your Charles Wells web experience. We may associate personal information with a cookie file in those instances. We may collect personal information about our visitors' online activities, overtime and across third-party websites, when using our Online services.

Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. Click on the "Help" section of your browser to learn how to change your cookie preferences. You may also be able to install browser plug-ins or other software to prevent cookies from being placed. If you disable all cookies, you may not be able to take advantage of all the features of this Site.

### Other Technologies

We may use other technologies, including web beacons and JavaScript, which sometimes work together with cookies and other means with our Sites and Mobile Apps to uniquely identify your device. These other technologies help enable features on our Sites and within our Mobile Apps. We may also use certain technologies to determine whether you have opened an e-mail or clicked on a link contained in an e-mail.

## **7. Links to Other Websites and Social Media**

Our Online Services may offer links to third-party websites that are not operated by Charles Wells. If you visit one of these linked websites, you should review the website's privacy policy, terms and conditions, and other policies. We are not responsible for the policies and practices of third-parties. Any information you submit to those third-parties is subject to their privacy policy, terms and conditions, and other policies.



## **8. Information Security**

Charles Wells is committed to taking appropriate measures designed to keep personal information secure. We have in place technical, administrative, and physical procedures designed to protect personal information from accidental, unlawful or unauthorised loss, access, disclosure, use, alteration, or destruction. While we take efforts to safeguard our information systems, no website, mobile application, computer system, or transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

## **9. Retention of Personal Information**

We retain personal information for the period of time necessary to fulfil the purposes outlined in this Privacy Policy and in accordance with Charles Wells records retention policies unless a longer retention period is required by law or necessary for our compliance with a legal obligation.

## **10. International Data Transfers**

Charles Wells operates outside of the UK (but within the EEA) with business processes, management structures and technical systems that cross borders. From time to time we also use suppliers outside of the UK/EEA.

As such, we may share information about you within the Charles Wells Group and transfer it to those countries in the world where we do business (including in the EEA and other countries), in connection with the uses identified above and in accordance with this Privacy Policy and as permitted by the applicable laws. No such transfer will be made without appropriate safeguards in place to guarantee the security of personal data.

## **11. Changes to our Privacy Policy**

We may change this Privacy Policy from time to time. If we change the Privacy Policy, we will post the revised version here and change the "Effective Date" listed at the top of this Policy. We encourage you to check here periodically for the most up-to-date version of our Policy.

## **12. How to Contact Us**

If you wish to contact us concerning this Privacy Policy you can email [privacy@wellsandco.com](mailto:privacy@wellsandco.com) or write to us at  
Privacy – Wells & Co. Compliance Team,  
Wells & Co  
Brewpoint  
Cut Throat Lane  
Fairhill  
Bedford  
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