

# TENANT PRIVACY POLICY

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Fuller, Smith & Turner P.L.C. is a family-controlled business, with a listing on the London Stock Exchange. We respect the privacy of our tenants and we have developed this Tenant Privacy Policy to explain to you how and why your personal data is processed by Fuller's, and to ensure your privacy is protected at all times.

## WHO COLLECTS THIS INFORMATION?

Fuller, Smith and Turner P.L.C. (the "Company") is a "Data Controller" and gathers and uses certain information about you. This information may also be used by any of our group companies (our "group companies") and so, in this Privacy Policy, references to "we", "our", "Fuller's" or "us" mean the Company and our group companies.

**Our Head Office is located at:** Fuller, Smith & Turner P.L.C.  
Pier House  
86-93 Strand-on-the-Green  
London, W4 3NN

**Our Phone number:** 020 8996 2000

If you want to get in touch with our Data Protection Officer about this Privacy Policy, or for any other data protection matters, you can do so by emailing: [privacy@fullers.co.uk](mailto:privacy@fullers.co.uk).

## PERSONAL DATA WE COLLECT ABOUT YOU

We may collect the following information about you during your tenancy with us:

- **Accommodation details** – Utilities company used, meter readings, monies owed (if applicable).
- **Contact data** – Residential address(es), personal and work email address(es), personal and work telephone number(s), emergency contacts (e.g. name, relationship and home and mobile phone numbers).
- **Credit data** – Previous addresses, previous names, bankruptcy details.
- **Criminal convictions & offence data** – Details of unspent convictions.
- **Education data** – Qualifications achieved, date qualification was achieved, grades, school, college, university attended.
- **Identity data** – Name, title, image data, driving license, NI number, DOB, nationality, passport, birth certificate, signature, gender, immigration status and information from related documents.
- **Job data** – Employment history, skills acquired, previous salary, reason for leaving, experience of catering.
- **Message data** – Messages that contain personal data received and sent between the tenant, Fuller's and affiliated parties (such as the police, solicitors and customers).
- **Payment data** – Source of funds, sort code, account number, bank branch, tax information, amount of funds available, amount of rent payable.

- **Pub data** – Pub of interest, area of interest, details of amenities, premises license number, pub location, risk assessment and safety check results, beer quality results, yearly financial forecasts, condition of the pub, business plan.
- **Reference data** – Reference name, reference contact number, reference job title.
- **Social media data** – Your use of public social media (only in limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur).
- **Tenant and you, your** – The person (or persons) or legal entity that rents a pub from Fuller's under the terms of a tenancy agreement (**the tenancy**).
- **Tenancy data** – Tenancy start/end date, length of tenancy, type of agreement, British Innkeeping Institute (BII) membership, experience of pub ownership.

## HOW WE COLLECT YOUR PERSONAL DATA

Your personal data is collected in a variety of ways, both before and throughout the tenancy.

Your personal data is collected from you when you:

- Visit or share our website;
- Correspond with us via email, text, telephone, through the help desk or post;
- Sign-up to tenancy alerts;
- Complete a tenancy application form;
- Submit your business plan to us;
- Sign your tenancy agreement;
- Complete your compulsory and optional training courses;
- Open a trading account with us (e.g. set up a direct debit or a standing order); and
- Use your available benefits with Fuller's.

We collect personal data about you when we:

- Operate CCTV in sites operated by Fuller's;
- Publish stories regarding tenants and their pubs through our internal publications;
- Receive a recommendation from Business Development Managers for you and your pub to be nominated for an award (e.g. Griffin Trophy Awards);
- Administer and manage competitions for tenants;
- Are provided with your beer quality results;

- Conduct a credit check; and
- Are provided with your pub's risk assessments and safety checks.

## HOW AND WHY WE USE YOUR PERSONAL DATA

In accordance with UK data protection legislation, we make sure that we have a lawful basis for processing your personal data.

The following personal data is collected from you for the **legal obligation** we have:

- Your identity data is used to ensure you have the right to operate in the UK. This is in accordance with our obligations under the Immigration, Asylum and Nationality Act 2006; and
- Your identity, contact, pub and tenancy data are used to manage our relationship with you in accordance with the Pubs Codes. This includes conducting rent reviews, lease or tenancy renewals, lease assignments, negotiations and appeals, and termination of our relationship should your tenancy agreement end.

The following personal data is collected from you for the **performance of a contract** which we have entered into with you:

- Your identity, contact, pub and tenancy data will be disclosed when your details are provided to third parties to offer their products or services;
- Your identity, contact, credit, criminal convictions and offence data are used to perform checks to ensure that you're a suitable candidate for the tenancy agreement;
- Your identity, contact and message data are used to communicate with you regarding your tenancy;
- Your identity, contact, payment, credit, pub, job, education, reference, accommodation and tenancy data are used to administer and manage the tenancy agreement you have with us, including providing the support package;
- Your identity, account, contact, payment and pub data are used to open a trading account with Fuller's and supply branded products;
- Your identity, contact, payment, pub and accommodation data are used to plan and begin a pub refurbishment;
- Your identity, contact, payment, pub and education data are used to book you onto and administer training courses; and
- Your identity, contact, pub and tenancy data are used to complete your business plan and understand your business plan financials alongside one of our Business Development Managers.

The following personal data is collected from you for Fuller's **legitimate interests**:

- Your identity, contact, pub, accommodation and tenancy data will be shared with utility companies and debt collectors in order to ensure that they receive monies owed, and Fuller's is not held liable for your debt;

- Your identity, contact and pub data are used to reference the pub and yourself as a tenant on the Fuller's website;
- Your identity, contact and message data are used in order to communicate with you and send you information regarding your tenancy via email, phone and post.
- Your identity, contact, pub and social media data are used should Fuller's conduct an investigation into a tenant's pub practices;
- Your identity and contact data are used to administer marketing emails to inform you of Fuller's news and new tenanted properties available to lease. If you would like to opt-out of receiving marketing from Fuller's, please contact [privacy@fullers.co.uk](mailto:privacy@fullers.co.uk);
- Your identity, contact, pub and tenancy data are used to give you access to a free BII membership;
- Your identity, contact and tenancy data are used to sign you up for a Fuller's Indulgence card which provides you with discounts to use at applicable Fuller's managed houses;
- Your identity, contact, pub and tenancy data are used for administering Fuller's competitions, publishing stories within the Fuller's internal communications and administering tenant awards;
- Your identity, contact, pub and tenancy data are used to inform individuals and companies internally and externally of when there is a new tenant appointed to a pub; and
- Your identity data will be collected when you are captured on CCTV while visiting a Fuller's venue. The CCTV footage will be used for the purposes of the prevention and detection of crime and to protect our employees and guests while on site. If requested, CCTV footage may be provided to the police.

## SHARING YOUR PERSONAL DATA

Fuller's are reliant on a number of third-party providers in order to assist in the administration of our tenancy agreements and to provide services to our tenants. Third parties will assist in the following:

- Provision of website hosting for tenanted pubs;
- Administration of the finance system;
- Administration of the Wi-Fi service;
- Administration of the online order system;
- Administration of compulsory and optional training;
- Administration of the property management system;
- Third parties who supply products ;
- Marketing, merchandising and social media;

- Cellar care;
- Building insurance and maintenance;
- Administration of the BII membership;
- Safety checks and assessments (e.g. fire risk assessment, gas safety checks);
- Administration of the Indulgence card; and
- Obtaining advice from our legal or professional advisors.

If requested, we will share your personal data with authorities including:

- The Police;
- The Health and Safety Executive;
- Local Authorities;
- His Majesty's Revenue and Customs (HMRC);
- The Courts; and
- Central or Local Government Bodies.

## **TRANSFERS OF DATA OUTSIDE THE EEA**

The European Economic Area (EEA), consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside of the UK and the EEA, we will tell you.

Currently, Fuller's do not transfer tenant data outside of the EEA. If this changes, Fuller's will ensure that tenants are informed by updating this privacy policy.

## **KEEPING YOUR PERSONAL DATA SECURE**

We protect the personal data that you have entrusted to us by using appropriate technical and organisational security measures, as well as ensuring that those organisations we share your personal data with are just as careful with your personal data as we are.

Tenants' personal data will be maintained internally on the Fuller's intranet and accessed by Business Development Managers and the Credit Control Team. Access to tenants' personal data will be restricted based on job role and will only be provided on a need-to-know basis.

## **RETENTION OF YOUR PERSONAL DATA**

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for processing. This includes satisfying any legal, accounting, or reporting requirements.

When we assess the retention of your personal data, we will take the following into consideration:

- Nature of the information;

- Sensitivity of the information;
- Potential risks if the information was breached;
- The purpose(s) for which we initially processed the information;
- Whether we can achieve the purpose(s) through less invasive means; and
- Any applicable legal requirements.

Your tenancy records will be kept by us for the duration of your tenancy plus a minimum of six years following termination.

After this period has expired, we will review the data records and securely delete your records where required.

## YOUR RIGHTS

Everybody has rights relating to the collection and use of their personal data. These are the rights that apply to your personal data held within Fuller's:

- **The right to be informed** – you have the right to know what information we hold and process about you, which is why we have provided this Privacy Policy.
- **The right of access** – you have the right to ask for a copy of the information we hold regarding yourself.
- **The right to rectification** – you have the right to ask us to correct any information we hold which may be inaccurate or incorrect.
- **The right of erasure** – you have the right to have your personal data 'erased' in the following situations:
  - Where the personal data is no longer required for the purpose(s) for which it was originally collected or processed;
  - Where the processing was based on consent and you have withdrawn your consent;
  - When the personal data was unlawfully processed; and
  - When the personal data has to be erased in order to comply with a legal obligation.

We will erase your records when one of the above situations apply.

- **The right to object** – you have the right to object to the processing of your personal data in the following circumstances:
  - The purpose of the processing activity is direct marketing;
  - Where the processing of your data relies on legitimate interests as Fuller's lawful basis (for example, to communicate and send you information regarding your tenancy with us); and
  - Processing for the purposes of scientific/historical research and statistics (for example, if your personal data is used for the reporting on Diversity & Inclusion statistics).

- **The right to restriction of processing** – you have the right to ask us to pause the processing of your personal data in certain situations such as:
  - If you have requested your personal data to be updated, we will temporarily pause processing your data until your request has been completed;
  - Where you consider our processing of your personal data to not be in line with data protection law and request us to pause the processing so this may be investigated;
  - Where we no longer need to hold your personal data, but you require the information to be retained by us for the purposes of establishing, exercising or defending a legal claim.
- **The right to data portability** – You have the right to request that we transfer your personal data to a third-party. This right only applies to automated personal data which you have either provided your consent for us to use or where we have used your personal data to perform a contract with you.
- **Rights in relation to automated decision-making including profiling** – you have the right to question decisions being made about you without any human involvement.

If you would like to exercise any of these rights, please get in contact with us using the details found at the bottom of this Privacy Policy.

## UPDATES TO OUR PRIVACY POLICY

We may update this Privacy Policy from time to time. If we make changes to this Privacy Policy, the updated version will be made available to tenants through Magento.

## CONTACT INFORMATION

If you have any questions about this Privacy Policy or how your data is processed, please contact us at:

Fuller, Smith & Turner P.L.C.,  
Pier House, 86-93 Strand on the Green,  
London,  
W4 3NN

Phone - 020 8996 2000

Email - [privacy@fullers.co.uk](mailto:privacy@fullers.co.uk).

Should you have any concerns about this Privacy Policy or the way that we are processing data you have the right to lodge a complaint with the Information Commissioner's Office. You can find more information at <https://www.ico.org.uk>.

## VERSION CONTROL

Version	Date	Approval by	Detail
1	25 June 2025	Rachel Spencer, Company Secretary	Policy Adopted