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## PRIVACY POLICY

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### HOW WE USE YOUR PERSONAL INFORMATION

This document sets out the privacy policy (the “**Policy**”) of Ruso Limited (“**We**, “**Us**, and “**Our**”) [www.sophiessteakhouse.com](http://www.sophiessteakhouse.com) or [www.steakclubapp.com](http://www.steakclubapp.com) and explains how We use your Data.

#### 1. **Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

“ <b>Data</b> ”	means collectively all information (meaning any information about you which is or may be personally identifiable such as your name, address, telephone number or email address) that you submit to Us via emails, Our Apps, Our Website and through any other communication;
“ <b>Members</b> ”	means any users that access the Apps or Website;
“ <b>Steak Club</b> ”	means the Apps, Website and service provided by Us in relation to Our loyalty scheme in place for customers at Sophie’s Steakhouse;
“ <b>Apps</b> ”	means Our available apps that you use to access Our content and services, unless expressly excluded by their own terms and conditions;
“ <b>Website</b> ”	Means, <a href="http://www.sophiessteakhouse.com">www.sophiessteakhouse.com</a> <a href="http://www.steakclubapp.com">www.steakclubapp.com</a>

#### 2. **Who are we?**

- 2.1 We are Ruso Limited of 311 - 313 Fulham Road, London, England, SW10 9QH with company number 03976230 and we operate the Steak Club.
- 2.2 We have a notification with the Information Commissioner’s Officer and are registered on the Data Protection Register under registration number **ZA223818**.

#### 3. **What information We collect about you**

Any of the following Data may be collected via the Apps or the Website from time to time:

- 3.1 name;
- 3.2 date of birth;
- 3.3 gender;

- 3.4 job title;
- 3.5 contact information such as email addresses and telephone numbers;
- 3.6 IP address (automatically collected when you visit our App or Website);
- 3.7 operating system (automatically collected when you visit our App or Website);
- 3.8 geo location when near the restaurants; and
- 3.9 data you may provide to us in surveys we ask you to complete for our research purposes, although you do not have to complete them.

#### 4. **Our Use of Data**

- 4.1 Any or all of the above Data may be used by us from time to time in order to provide you with the service and intended experience when using our Apps and Website. Specifically, Data may be used by us for the following reasons:
  - 4.1.1 internal record keeping;
  - 4.1.2 to ensure that content from Our Website and Apps is presented in the most effective manner for you and to your computer;
  - 4.1.3 to provide you with information, products or services that you request from Us or which We feel may interest you, where you have consented to be contacted for such purchase;
  - 4.1.4 to carry out Our obligations arising from any contracts entered into between you and Us;
  - 4.1.5 to allow you to participate in interactive features of Our services;
  - 4.1.6 to notify you about changes to Our services; or
  - 4.1.7 compliance with legal requirements, such as the financial reporting and others.
- 4.2 If you are a Member, We will only contact you by electronic means (email or SMS) with information about goods and services similar to those which were the subject of a previous sale or sales enquiry;
- 4.3 If you do not want Us to use your Data in the way set out in clause 4.2, or to pass your details on to third parties for marketing purposes, please update your marketing preferences by contracting us at [support@steakclubapp.com](mailto:support@steakclubapp.com).
- 4.4 Any Data you submit will be retained by Steak Club for minimum 2 years and not for longer than is necessary.
- 4.5 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties.
- 4.6 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 9 below.
- 4.7 Your information will not be transferred outside the EEA.

#### 5. **Will we share your Data with third parties?**

- 5.1 We may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment processing, app development, delivery of purchased items, advertising and marketing. The providers of such services may have access to certain Data provided by Members of Steak Club.
- 5.2 Any Data used by such parties is used only to the extent required by them to perform the services that Steak Club requests. Any use for other purposes is

strictly prohibited. Furthermore, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.

5.3 We may disclose some of your Data to third parties:

5.3.1 if you have consented to Us sharing your details with carefully selected third parties whose products and services may interest you;

5.3.2 if We sell or buy any business or assets, in which case We may disclose your Data to the prospective seller or buyer of such business or assets;

5.3.3 if Steak Club or substantially all of its assets are acquired by a third party, in which case Data held by it about its customers will be one of the transferred assets; or

5.3.4 if We are under a duty to disclose or share your Data in order to comply with any legal obligation, or in order to enforce or apply Our terms of use on our Apps [www.steakclubapp.com](http://www.steakclubapp.com) or Website terms of use [www.sophiessteakhouse.com](http://www.sophiessteakhouse.com) and other agreements; or to protect the rights, property or safety of Steak Club, Our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 6. Links to Websites

This Website may, from time to time, provide links to other websites. Steak Club has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Members are advised to read the privacy policy or statement of other websites prior to using them.

## 7. Controlling Use of Your Data

7.1 You may request to have all Data regarding you erased, but this will terminate your ability to later make claims to any rewards earned during your Steak Club Membership.

7.2 We also have a right to keep certain Data for lawful purposes.

## 8. Accessing your own Data

8.1 To find out more about how your Data will be used, or to make a complaint, please contact Us at [support@steakclubapp.com](mailto:support@steakclubapp.com).

8.2 You have the right to ask for a copy of any of your Data held by Us. We may have a right to request a small fee.

8.3 We want to make sure your Data is accurate and up to date. You may ask Us to correct or remove information you think is inaccurate by contacting Us at [support@steakclubapp.com](mailto:support@steakclubapp.com) or 311-313 Fulham Road, London, SW10 9QH.

8.4 We hope you will be happy with the way We handle your Data but if not you have the right to complain to the Information Commissioner if there is a problem – for more information visit [www.ico.gov.uk](http://www.ico.gov.uk).

9. **Security**

**Data security is of great importance to Steak Club and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via the Apps and Website.**

10. **Location tracking**

The Apps use location services to aid the experience and to improve our range of products and services. Steak Club has carefully chosen the location tools and has taken steps to ensure that your privacy is protected and respected at all times.

Where possible the location is only active in the device itself or only activated when within range of the restaurants. We only store location data about which restaurants you visit and end location tracking as soon as you walk out the door.

11. **How to contact Us**

11.1 Please contact Us if you have any questions about Our Policy or information We hold about you:

11.1.1 By email at [support@steakclubapp.com](mailto:support@steakclubapp.com); or

11.1.2 Write to us at 311-313 Fulham Road, London, SW10 9QH.