



Catering Services Privacy Notice

1. Introduction

We believe that transparency is the key to any healthy relationship. We appreciate that you are trusting us with information that is important to you, and we want to be transparent about how we use it.

This Privacy Notice explains in detail the types of personal information we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how the House of Commons Catering Services team uses your data. We hope the following sections will answer any questions you have but if not, please do **Contact Us** by email or by calling 020 7219 3686.

Use the links below to find out more about how we use your personal information:

- **[Who are we and how do you contact us and our Data Protection Officer?](#)**
- **[What kinds of personal information about you do we process?](#)**
- **[What is the source of your personal information?](#)**
- **[What are the lawful base's for our processing of your personal information \(including when we share it with others\)?](#)**
- **[What should you do if your personal information changes?](#)**
- **[For how long is your personal information retained by us?](#)**
- **[What are your rights under data protection laws?](#)**

The House of Commons and our Data Protection Officer

We are the House of Commons, London, SW1A 0AA - which we'll refer to as "HOC" in this document. The Corporate Officer (Clerk of the House) is the Controller of any personal information processed as described in this Privacy Notice.

We have a data protection officer ("DPO"), the Head of the Information Rights and Information Security ("IRIS") service, who ensures that the day-to-day obligations of the Data Protection Legislation are met. If you have any questions about this Privacy Notice, or if you wish to exercise your rights or contact the DPO, you can contact the **IRIS Service** by email or by calling 020 7219 4296. Alternatively, you can write to IRIS Service, House of Commons, London, SW1A 0AA marking it for the attention of the DPO.

The IRIS Service is responsible for HOC's compliance with Data Protection Legislation by ensuring requests are handled in line with our obligations and information is made publicly available where appropriate.



2. What kinds of personal information do we process?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you. The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service. Of course, if you wish to change how we use your data, you'll find details in the '[What are your rights?](#)' section below.

Personal information that we'll process in connection with all of our products and services, where relevant, includes:

- **Personal and contact details**, such as title, full name, email address, postal address, other relevant contact details and contact details history
- **Your gender**
- **Your interactions with us** including via phone or email, or if you get in touch with us through our various catering outlets and teams or online. For example, we may collect notes from our conversations with you, details of any complaints or comments you make, details of services used with us, and how and when you contact us
- **Copies of personal documents** you provide to prove your identity, for example when applying to host a private event (including your passport and driver's license). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality
- **Products and services** you use, as well as have been interested in and have held and the associated payment methods used for example the details of what products were provided and whether they were paid for or not (and details related to this), details of service orders in our restaurants and how they were paid for
- **Analysing marketing data**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you. Products may include our events services, commercial afternoon teas packages, pop-up dining experiences
- **Information about your use of products or services from other HOC teams**, such as the Central Finance team, Visitor and Retail Services team, the Serjeant at Arms team, the Accommodation and Logistics team
- **Third party transactions**; such as where a person other than you pays for the service, information about that person and the transaction
- **Tax information**, where relevant (for example, customers from abroad)

All personal information you provide to HOC will be stored securely, both physically and electronically, in accordance with our [Authorised Records Disposal Policy](#).



3. What is the source of your personal information?

When you contact us, visit us, access or use our services either online, by post, in person or by other means, we may collect, store and use your personal information. We'll collect personal information from the following general sources:

- From you directly, and any information from associates or beneficiaries of products and services:
 - When you contact us by any means with queries, complaints, etc.
 - When you book any kind of appointment with us or book to attend an event
 - When you choose to complete any surveys or feedback requests we send you
 - When you comment on or review our products and services
 - When you fill in any forms. For example, when ordering catering for an event or if an accident happens on site
 - Calls are recorded when you telephone us
 - Information generated about you when you use our products and services
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4. What do we use your personal information for?

We use your personal information, including any of the personal information listed in section 2 above, for the following purposes:

- Managing any aspect of the products and services relating to our various product offerings, or application for one including assessing an application for holding an event with us, considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms
- Updating your records, contacting you about your account and doing this for recovering debt (where appropriate)
- To perform and/or test the performance of our products, services and internal processes
- To monitor and to keep records of our communications with you and our teams
- To administer our good governance requirements and those of other members of HOC, such as internal reporting and compliance obligations or administration required for reporting processes
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and services
- To develop new products and services and to review and improve current products and services
- To provide insight and analysis of our customers both for ourselves and for the benefit of our service partners either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our business



5. What are the legal grounds for our processing of your personal information (including when we share it with others)?

The law on data protection sets out a number of different reasons for which we may collect and process your personal information. Details about the lawful basis for processing personal information can be found on the [Information Commissioner's website](#). The lawful bases include:

1. Where **it is needed to provide you with our products or services**, such as:
 - a) The processing is necessary to fulfil a contractual agreement between you and us
 - b) Managing any aspect of the products and services relating to our various product offerings, or application for one
 - c) Updating your records, contacting you about your account and doing this for recovering debt (where appropriate)
 - d) Sharing your personal information with service partners when you use one of our services to help manage your product, for example, our floristry contractor to discuss flower budgets and floral requirements, or our audio visual provider to go through presentation specifications and the required equipment, or our Kosher supplier to choose kosher dishes to accommodate specific dietary requirements
2. Where **it is in our legitimate interests to do so**, such as:
 - a) Managing your products and services relating to that product or service, updating your records, contacting you about your account and doing this for recovering debt (where appropriate)
 - b) To provide and/or test the performance of our products, services and internal processes
 - c) To keep records of our communications with you and our staff
 - d) To record telephone calls for quality monitoring and training purposes
 - c) For market research and analysis and developing statistics
 - d) Subject to the appropriate controls, to provide insight and analysis of our customers to HOC and service partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our business
 - e) For some of our profiling and other decision making
3. To comply with our **legal and regulatory obligations**
4. With your **consent or explicit consent**:
 - a) For some direct marketing communications
 - b) For some of our profiling and other decision making



c) For some of our processing of special categories of personal information such as about your health, allergies and food intolerances, or if you are a customer with particular needs

6. When do we share your personal information with other organisations?

We may disclose your personal information to third parties when permitted to do so including:

- with your consent
- where we have a contract with a processor acting on our behalf
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation. This includes providing your personal information to other organisations, such as the Police, for the purposes of prevention and detection of crime

We may share information with the following third parties for the purposes listed below:

- Service partners or others who are a part of providing our products and services or supporting our business
 - The House of Lords administration (who is a separate Controller) for the provision of shared services to you
 - Governmental and regulatory bodies such as HMRC, the National Audit Office, the Westminster Council Food Team and the Information Commissioner's Office
 - Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
 - Market research organisations who help us to develop and improve our products and services
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7. How and when can you withdraw your consent?

Where we are relying upon your consent to process personal information, you can withdraw this at any time. You can **Contact Us** by email or by calling 020 7219 3686.

8. Is your personal information transferred outside the UK or the EEA?

We (or processors acting on our behalf) may store or process your personal information in countries outside the European Economic Area, but only where we are assured of the security of the data. We have put in place technical and organisational measures to minimise the possibility of the loss or unauthorised access of your personal information.



9. What should you do if your personal information changes?

You should tell us so that we can update our records. You can [Contact Us](#) by email or by calling 020 7219 3686. We'll then update your records if we can.

10. Do you have to provide your personal information to us?

If you choose not to share your personal information with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for. In cases where providing some personal information is optional, we'll make this clear.

11. For how long is your personal information retained by us?

The House of Commons will retain your personal information for as long as is necessary for the purpose it was collected. In most cases a retention period will apply which can be found in the Houses of Parliament [Authorised Records Disposal Policy](#) on our website. Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

12. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not.

- The right **to be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right **to object** to processing of your personal information
- The right **to restrict processing** of your personal information



- The right **to have your personal information erased** (the “right to be forgotten”)
- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** (“data portability”)
- Rights in relation to **decision making which has a legal effect or otherwise significantly affects you**

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: www.ico.org.uk You can contact the **IRIS Service** by email or by calling 020 7219 4296.

13. What are your marketing preferences and what do they mean?

We may use your given addresses, phone numbers, email addresses and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you with your explicit consent. You can stop our marketing at any time by following the instructions in the communication or you can **Contact Us** by email or by calling 020 7219 3686.

Please note that you may continue to receive communications for a short period after changing your preference while our systems are fully updated.

14. Changes to this Privacy Notice

We may change this Privacy Notice from time to time in order to reflect changes in the law and/or our privacy practices.

We encourage you to check this Privacy Notice for changes whenever you visit our website www.parliament.uk/cs-privacy

This notice was last updated on 22/05/2018

You can view previous versions of our Privacy Notice in **Our Archive**.