

## CHOPPS AMERICAN BAR AND GRILL PRIVACY POLICY

### 1. OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

- We place a high value on user privacy and data protection
- We collect and store data only when necessary
- We will never sell, rent, or otherwise distribute or make public your personal information, unless required by law or legal authorities to do so.

### 2. RELEVANT LEGISLATION

This website is designed to comply with applicable data protection laws, including all relevant U.S. and state laws and EU General Data Protection Regulation 2018 (GDPR).

### 3. PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons: to deliver the services that you requested or purchased and maintain records as are necessary related to those services.

### 4. SITE VISITATION TRACKING

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages, and to review their journey through the website.

Although GA records data such as your geographical location, device, internet browser, and operating system, none of this information personally identifies you to us. GA also records your computer's IP address, which could be used to personally identify you, but Google does not grant us access to this. We consider Google to be a third-party data processor (see section below).

GA makes use of cookies, details of which can be found on Google's developer guides. Our website uses the "analytics.js" implementation of GA. Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

In addition to GA, this website may collect information held in the public domain and attributed to the IP address of the computer or device that is being used to access it.

[IF THE PROPERTY HAS A BLOG]

### 5. BLOG

Should you choose to add a comment to any posts that we have published on blog sites, the name and email address you enter with your comment will be saved to this website's database, along with your computer's IP address and the time and date that you submitted the comment. This information is only used to identify you as a contributor to the comment section of the respective blog post and is not passed on to any of the third-party data processors detailed below. Only your name and email address that you supplied will be shown on the public-facing website.

Your comments and its associated personal data will remain on this site until we see fit to either remove the comment or remove the blog post. Should you wish to have the comment and its associated personal data deleted, please email us here using the email address that you commented with.

If you are under 16 years of age you MUST obtain parental consent before posting a comment on our blog.

NOTE: You should avoid entering personally identifiable information to the actual comment field of any blog post comments that you submit on this website.

## **6. CONTACT FORMS AND EMAIL LINKS**

Should you choose to contact us using the contact form on our Contact us page, none of the data that you supply will be stored by this website or passed to / be processed by any of the third-party data processors defined in section below. Instead, the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted before being sent across the internet. The email content is then decrypted by our local computers and devices.

## **7. EMAIL NEWSLETTER**

If you choose to join our email newsletter, the email address that you submit to us will be forwarded to Constant Contact who provide us with email marketing services. We consider Constant Contact to be a third-party data processor (see section below). The email address that you submit will not be stored within this website's own database or in any of our internal computer systems.

Your email address will remain within Constant Contact database for as long as we continue to use constant contact for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you MUST obtain parental consent before joining our email newsletter.

## **8. THIRD PARTY DATA PROCESSORS**

We use several third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section above.

## **9. COOKIE POLICY**

This policy covers the use of cookies and other technologies. The types of cookies we use fall into 3 categories:

### **a. ESSENTIAL COOKIES AND SIMILAR TECHNOLOGIES**

These are vital for the running of our services on our websites and apps. Without the use of these cookies, parts of our websites would not function. For example, session cookies allows a navigation experience that is consistent and optimal to the user's network speed and choice of device.

#### **b. ANALYTICS COOKIES AND SIMILAR TECHNOLOGIES**

These collect information about your use of our websites and apps, and enable us to improve the way it works. For example, analytics cookies show us which are the most frequently visited pages. They also help identify any difficulties you have accessing our services, so we can fix any problems. Additionally, these cookies allow us to see overall patterns of usage at an aggregated level.

#### **c. TRACKING, ADVERTISING COOKIES AND SIMILAR TECHNOLOGIES**

We use these types of technologies to provide advertisements that are more relevant to your interests. This can be done by delivering online adverts based your previous web browsing activity. Cookies are placed on your browser that will remember the websites you have visited. Advertising based on what you have been looking at is then displayed to you when you visit websites who use the same advertising networks.

We may also use cookies and similar technologies to provide you with adverts based on your location, offers you click on, and other similar interactions with our websites and apps.

### **10. DATA BREACHES**

We will report any unlawful data breach of this website's database or the database(s) of any of our third-party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

### **11. CHANGES TO OUR PRIVACY POLICY**

This privacy policy may change from time to time to conform with legislation and/or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

### **12. HOW TO CONTACT US**

For any questions or concerns regarding this Privacy Statement or our data privacy practices, please contact us:

By email: [chopps@agency451.com](mailto:chopps@agency451.com)

By post: Chopps American Bar and Grill, One Burlington Mall Road Burlington, MA 01803

To the extent permitted under the local law, you may also use the above contact details to request access to any of your personal information that is held by **Chopps American Bar and Grill**. These requests will be reviewed and processed in line with the local law.

Where EU data protection laws apply, you have a right to lodge a complaint with your local data protection supervisory authority at any time. However, we ask that you please try to resolve any issues with us first before referring your complaint to the supervisory authority.