MAXWELL’S RESTAURANTS GROUP PRIVACY POLICY

Maxwell’s Restaurants Group is committed to safeguarding your privacy online. This statement explains how we will collect, use and disclose information. This statement may change from time to time, so please check this page periodically. Maxwell’s Restaurants Group takes protecting your privacy extremely seriously and takes all reasonable steps to ensure your information is secure. The use of your personal information, why we collect it and what we save varies depending on how you interact with Maxwell’s Restaurants Group and to what consent you have given us. We have done our best to indicate this throughout the statement. There may be other privacy policies that apply to certain services we provide. We will make these explicit when they apply. Please read them before you subscribe for such services.

Maxwell’s Restaurants Group Venues

<table>
<thead>
<tr>
<th>Venue</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roadhouse</td>
<td><a href="http://www.roadhouse.co.uk">http://www.roadhouse.co.uk</a></td>
</tr>
<tr>
<td>Tropicana Beach Club</td>
<td><a href="http://www.tropicanabeachclub.co.uk">http://www.tropicanabeachclub.co.uk</a></td>
</tr>
<tr>
<td>Café de Paris</td>
<td><a href="http://www.cafedeparis.com">http://www.cafedeparis.com</a></td>
</tr>
<tr>
<td>Maxwells</td>
<td><a href="http://www.maxwells.co.uk">http://www.maxwells.co.uk</a></td>
</tr>
<tr>
<td>Joess Southern</td>
<td><a href="http://www.joessouthern.co.uk">http://www.joessouthern.co.uk</a></td>
</tr>
<tr>
<td>Sticky Fingers</td>
<td><a href="http://www.stickyfingers.co.uk">http://www.stickyfingers.co.uk</a></td>
</tr>
<tr>
<td>Palm Court Brasserie</td>
<td><a href="http://www.palmcourtbrasserie.co.uk">http://www.palmcourtbrasserie.co.uk</a></td>
</tr>
<tr>
<td>Boulevard Brasserie</td>
<td><a href="http://www.boulevardbrasserie.co.uk">http://www.boulevardbrasserie.co.uk</a></td>
</tr>
<tr>
<td>PJ’s Bar And Grill</td>
<td><a href="http://www.pjsbarandgrill.co.uk">http://www.pjsbarandgrill.co.uk</a></td>
</tr>
</tbody>
</table>

This privacy policy (together with our terms of use on the website and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our websites you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller Maxwell’s Restaurants Group Limited of 22 Henrietta Street, Covent Garden, London, WC2E 8ND. Our nominated representative for the purpose of the Act is our Guest Relations Manager.

Information Collected
In general, you may visit the website without providing us with any personal data about yourself. Our servers will collect the domain names, operating system in use and browser when you access the website. This information is aggregated to measure, inter alia, the number of visits, average time spent on the Website and pages viewed. Maxwell’s Restaurants Group uses this information to measure the usage of the Website and to improve the Website’s content. E-mail addresses and other personally identifiable information such as first and last name, home or other physical address, telephone number, date of birth or financial details are communicated only when they are voluntarily provided by a visitor for registration purposes or to enable a visitor to participate in making a booking for example. Maxwell’s Restaurants Group also collects information from users who click on advertisements in order to measure interest and to inform advertisers how many users have seen or clicked on their advertisement. If Maxwell’s Restaurants Group ever requests that you volunteer additional information, such as financial data or age (in an online survey, for example) your response will always be voluntary and this data will only be used as an aggregate of data in conjunction with other users of Maxwell’s Restaurants Group.

Use of Your Information
We may use the personal information that you provide for legitimate purposes including the following: (1) to understand the use of our website and make to improvements to it; (2) to award
prizes for competitions you have entered; (3) to respond to informational requests from yourself; (4) to notify you about changes to our service; (5) to send you notices and solicitations regarding our businesses; (6) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us; and (7) in general to promote and market products to you. These solicitations may take the form of mailings, telephone calls, e-mail solicitations and other normal methods of contact. Details of how you can opt out of receiving these communications can be found later in this policy. At times, we may conduct online surveys to better understand the needs and profiles of our visitors. When we conduct a survey, we will do our best to let you know how we will use the information at the time we collect it.

Disclosure of Your Information
You agree that we have the right to share your personal information with: (1) Any member of our group, which means our subsidiaries, our company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006; and (2) Selected third parties including (a) business partners, suppliers and sub-contractors for the performance of any contract we enter into with you; (b) advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users; (c) analytics and search engine providers that assist us in the improvement and optimisation of our site; and (d) credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you. Unless otherwise disclosed during the collection or as set out above, personally identifiable information that is collected is retained by Maxwell’s Restaurants Group. Maxwell’s Restaurants Group does not disclose such information to third parties save in the following circumstances: (1) as required by law or regulatory authority; (2) we are under a contractual or other obligation to do so (this may include co-operating with third parties to prevent fraud); (3) as otherwise described in this privacy policy and / or our Website terms of use; and (4) in connection with a sale of our business.

Other Websites
The Website may contain links to other sites owned and hosted by third parties. We are not responsible for the content or privacy practices of those other sites and the fact we include a link to their site on our Website is in no way a recommendation or endorsement of the services they provide and /or the integrity of their site which you access entirely at your own risk. Such web sites may have their own privacy policy which we advise you to review before you transmit any data to them.

Cookies
A technology called "cookies" may be used to provide you with tailored information. A "cookie" is a tiny element of data that a website can send to your browser, which may then be stored on your hard drive so we can recognize you when you return. You may be able to set your browser to notify you when you receive a cookie. Our cookies collect the operating system and browser that a visitor is using. Maxwell’s Restaurants Group cookies cannot be used by themselves to identify you and you have the ability to accept or decline cookies by modifying the settings in your browser. Please be aware however that some interactive features of the Website may not work if cookies are disabled. For instructions on how to disable and manage cookies please go to the following web address: www.allaboutcookies.org/manage-cookies.

Maxwell’s Restaurants Group E-mail Policy
When you give Maxwell’s Restaurants Group your e-mail address, you are asked to let Maxwell’s Restaurants Group know how it can be used. You may 'opt in' to receive regular e-mail newsletters that contain information Maxwell’s Restaurants Group believes to be of value to you, specifically
events, special discounts and offers selected by the marketing department of Maxwell’s Restaurants Group. Data will not be passed on to third parties. If you make a purchase via the Website the assumption will be made that you will be interested in similar products and you may receive emails with information about these products. You can unsubscribe from receiving emails from Maxwell’s Restaurants Group at any time by following the unsubscribe link at the bottom of any email you receive from us.

**Required disclosures**
Maxwell’s Restaurants Group co-operates with all law-enforcement authorities and reserves the right to disclose personally identifying or aggregate information in connection with crime prevention, a subpoena or other court-sanctioned demand for such information.

**Security**
Maxwell’s Restaurants Group has security measures in place to protect against the loss, misuse and alteration of the information under its control. Despite these efforts Maxwell’s Restaurants Group cannot guarantee that an unauthorised third party won’t obtain access to communications between users and Maxwell’s Restaurants Group. Accordingly all data is supplied at the sole risk of the user.

**Collection of personal data from Children**
Content on the Website is not directed to users under the age of 13 years old (Children”). Maxwell’s Restaurants Group will never knowingly collect information from Children.

**Where We Store Your Personal Data**
The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

**Your Rights**
You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at customerservice@maxwellsgroup.co.uk. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**Access to Information and Contact Information**
You have a legal right to access personal data that is held about you. Should you wish to access your personal information, please write to us at: Data Administrator, 22 Henrietta Street, Covent Garden, London, WC2E 8ND. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: customerservice@maxwelsgroup.co.uk

Marketing
Please note that your information may be used to send you details of those products or services that we offer that we have identified as likely to be of interest to you. If at any point you would like to opt-out of receiving communications from Maxwell’s Restaurants Group by any of these preferences you can use the links provided at the bottom of our emails, or contact abuse@airship.co.uk.

Data capture Form
Maxwell’s Restaurants Group will contact subscribers with communication, promotions and offers from time to time. According to the email preference you clicked when you completed our data capture form. If you wish to change these preferences or unsubscribe, please use the links provided at the bottom of our email communications, or contact abuse@airship.co.uk.

Changes to our privacy Policy
Amendments to Privacy Policy This policy is effective as of 1st October 2017. Maxwell’s Restaurants Group may change this policy at any time by publishing an amended or updated Privacy Policy on the Website. By accessing and using the Website you are deemed to have accepted the terms of this privacy policy, as updated from time to time. Updated November 2017.