

Date last updated; September 2026

Privacy Policy – Lemon Pepper Holdings Limited

Introduction

Welcome to the Lemon Pepper Holdings Limited (“we”, “us”, or “our”) privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data, tell you about your privacy rights and how the law protects you.

1.Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of our services as well as through third parties that we work with.

Given the nature of our services, we do not generally expect to collect the personal data of anyone under 16 years old. Wingstop Flavour Club is available only to individuals aged 16 or over. Members aged 16 or 17 have restricted access to certain Flavour Club features.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

This Privacy Policy provides details of the way in which we process personal data in line with our obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), and any other laws which apply to us in relation to the processing of personal data (collectively referred to as “Data Protection Laws”).

In this Privacy Policy, “joint controller” “personal data”, and “process” (and its derivatives) have the meanings given to those terms in Data Protection Laws. Personal data generally means information that can be used to individually identify a person, and processing generally covers actions that can be performed in connection with data such as the collection, use, storage, or disclosure.

Lemon Pepper Holdings Limited (LPH), alongside Wingstop Restaurants Inc (WRI), are joint controllers in respect of certain personal data that is processed for the facilitation of services to you. LPH and WRI are joint controllers with respect to the data processing activities described in WRI’s Privacy Notice (accessible at [\[link\]](#)), except with respect to information that WRI automatically collects (as described at Section 1.2 of WRI’s Privacy Policy).

LPH is the sole controller of personal data collected and processed in connection with the Flavour Club loyalty programme.

Where LPH and WRI carry out activities as joint controllers, they jointly take decisions regarding the purposes and means of processing your personal data. It also means that if you would like to exercise any of your rights described below, both companies will act jointly for the facilitation of your request. LPH otherwise acts as a sole controller of the data processing activities described in this privacy policy.

Our details are below:

Wingstop Restaurants Inc.
2801 N Central Expressway
Dallas, Texas 75204
U.S.A.
Attn: CISO
Email: Privacy-UK@Wingstop.co.uk

Lemon Pepper Holdings Limited
36–40 Maple Street
Fitzrovia
London
W1T 6HE
Company number: 10589672
ICO registration number: ZB438032
Email : dataprivacy@lemon-pepper.co.uk

Contact

If you have any questions about this privacy policy, including any requests to exercise your legal rights, or any questions about this privacy policy or our privacy practices please contact us using the details set out above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would however appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Data protection complaints

If you make a complaint to us about how we use your personal data, including Flavour Club data, we will provide a clear way for you to raise it, acknowledge the complaint within 30 days, take appropriate steps to investigate it without undue delay, keep you informed where appropriate, and tell you the outcome. Privacy complaints and rights requests can be sent to Privacy-UK@Wingstop.co.uk. General Flavour Club membership queries can be

sent to flavourclub@wingstop.co.uk. You also have the right to complain to the Information Commissioner's Office (ICO).

Changes to the privacy policy and your duty to inform us of changes

This Privacy Policy is current as of the effective date set forth above. We may change this Privacy Policy from time to time, so please be sure to review the Privacy Policy at <https://www.wingstop.co.uk/privacy> periodically.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. Your data and how it is collected

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you depending on how you interact with us.

The types of personal data we process include:

- (a) Identity Data includes your first name, last name and date of birth.
- (b) Contact Data includes your email address and telephone number and, where required for order or prize fulfilment, your postal or delivery address.
- (c) Marketing and Communications Data includes your preferences for receiving marketing and communications from us, your consent and preferences by communication channel (such as email, SMS and push notifications), and information about your engagement with those communications.
- (d) Flavour Club Data includes information you provide and information generated through your membership of Wingstop Flavour Club, including:
 - Preference Data: your self selected Flavour Signature or flavour identity and other preferences or interests you choose to provide.
 - Transaction Data: items ordered, basket value, visit frequency, ordering channel, daypart and restaurant location, including eligible transactions linked to your membership account.
 - Behavioural Data: information about how you use and engage with Flavour Club, including Hub and Digital Wallet activity, Drops, games, quests and Badge progress.
 - Loyalty Data: information relating to your membership and rewards, including Stamps, Reward Vouchers and other Flavour Club benefits or activity.

We collect this information when you provide it to us or interact with us, including when you join or update your Wingstop Flavour Club account, use your membership in a restaurant, place an order through an eligible digital or integrated delivery channel, use the Flavour Club Hub or Digital Wallet, participate in Flavour Club activities, contact us, complete customer surveys, or participate in competitions, prize draws and promotions.

Personal data we receive from third parties

We may also receive personal data about you from third parties that help us provide our services and understand and improve the customer experience, including:

(a) Deliveroo: Where you order through Deliveroo, we may receive Identity Data, Contact Data and information about your order where necessary to fulfil your order or provide related customer support. Where you have consented to receive marketing from us, we may also process your Marketing and Communications Data.

(b) Vita Mojo: Where you use a Click and Collect service through Vita Mojo, we may receive and process your Identity Data, Contact Data and relevant order information to fulfil your order and provide related customer support.

(c) Wireless Social: When you connect to Wi-Fi in one of our restaurants, you may provide personal data to our Wi-Fi service provider, Wireless Social. Where you consent to receive marketing from us when using the Wi-Fi service, we may receive and process your Identity Data, Contact Data and Marketing and Communications Data.

(d) Toggle: Where you purchase, send or receive a Wingstop gift card, we may receive and process personal data through our gift card service provider, Toggle. This may include Identity Data, Contact Data and information relating to the purchase, delivery and use of the gift card, which we use to fulfil the transaction and provide related customer support.

(e) HGEM: Where you complete a Wingstop customer satisfaction or feedback survey, our customer experience provider, HGEM, may collect personal data you provide as part of your response. We may receive and process this information, which may include Identity Data, Contact Data and information about your visit, order and customer experience, to review and respond to your feedback, measure customer satisfaction and improve our restaurants, products and services.

Data and Marketing and Communications Data.

Information collected automatically when you visit or use the Wingstop UK website is processed by Wingstop Restaurants Inc. Further information about how this data is processed is available in the Wingstop Privacy Policy.

3. How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason to do so (a “legal basis”), e.g.:

- (a) where you have given consent;
- (b) to comply with our legal and regulatory obligations;
- (c) for the performance of a contract with you or to take steps at your request before entering into a contract; or
- (d) for our legitimate interests or those of a third party.

We have set out all the ways we plan to use your personal data, and which of the legal bases we rely on to do so in each section where we describe how and when we process your data.

We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one basis has been set out in the table below.

Purpose / activity	Personal data used	Legal basis
For fulfilling click and collect orders you make with our restaurants via third party food order platforms (Deliveroo and Vita Mojo)	Identity Contact	Necessary for performance of a contract
For fulfilling gift card orders you make via our website via third party provider (Toggle)	Identity Contact Transaction	Necessary for performance of a contract
For the protection of our employees, customers and property via the use of CCTV in our restaurants	Visual images	Necessary to comply with a legal obligation (as required under our business licence) Necessary for our legitimate interest (ensuring our restaurants are safe for both our employees and customers)
Investigating and taking any actions in relation to health and safety incidents as required by law.	Identity Contact	Necessary to comply with legal obligation
To manage our relationship with you which will include (a) Notify you about changes to our privacy policy (b) In connection with the exercise of any of your rights in relation to our processing of your personal data (c) Handling and resolving any complaints and (d) Asking you to leave a review or take a survey	Identity Contact	Necessary to comply with legal obligation Necessary for our legitimate interests (to administer our business, keep our records updated and to study how customers use our product and services)

How we use Flavour Club data

Purpose / activity	Personal data used	Legal basis
Operate and administer Flavour Club, including accounts, Stamps, Reward Vouchers, Drops and programme features.	Identity data, Contact data and Flavour club data.	Performance of the membership contract (Article 6(1)(b) UK GDPR)
Personalise your Flavour Club experience, including the Hub, Wallet, content, benefits and offers using your Flavour Signature, purchase history and engagement.	Identity Data and Flavour Club data including preference, transaction and behavioural data.	Legitimate interests (Article 6(1)(f) UK GDPR) in improving the relevance of rewards and member engagement, subject to a Legitimate Interests Assessment and the member's right to object.
Send programme-essential and service communications, including Stamp confirmations, Reward Voucher alerts and important account expiry notices.	Identity data, contact data and relevant flavour club data. .	Performance of the membership contract (Article 6(1)(b) UK GDPR)
Send marketing about products, offers and Flavour Club by email, SMS and push notification.	Identity data, contact data, marketing and communications data and relevant flavour club data	Consent (Article 6(1)(a) UK GDPR). Consent is obtained separately from acceptance of the Flavour Club terms & conditions, is granular by communication channel, and can be withdrawn at any time.
Run games, quests, prize draws and competitions, assess eligibility and award prizes.	Identity data, contact data and relevant flavour club data.	Legitimate interests (Article 6(1)(f) UK GDPR) in operating and engaging members through Flavour club, consent or another appropriate legal basis where required for a specific activity.
Measure and improve Flavour Club including understanding programme performance and member engagement.	Flavour club data, including transaction and behavioural data.	Legitimate interests (Article 6(1)(f) UK GDPR) in understanding and improving flavour club and member experience.
Detect and prevent fraud, abuse, duplicate accounts and improper stamp or reward voucher activity	Identity data, contact data and relevant Flavour Club data including transaction and behavioural data	Legitimate interests (Article 6(1)(f) UK GDPR) in protecting Flavour club, our members and our business from fraud and misuse and compliance with legal obligations where applicable.

Flavour Signature, profiling and automated decision-making

We may use your Flavour Signature, purchase history and engagement with Flavour Club to personalise your experience. This involves profiling.

We do not currently use solely automated decision-making in connection with Flavour Club that produces legal or similarly significant effects on you. If this changes, we will update this Privacy Policy and apply the safeguards required by Data Protection Laws.

4. Disclosures of your personal data

Sharing within the Lemon Pepper group

We may share your personal data with our officers, employees and companies within the Lemon Pepper group where necessary for the purposes described in this Privacy Policy.

Our group companies are companies incorporated in the UK that we control and use in connection with the operation of our business and services. We only share personal data with these companies where necessary and in accordance with applicable Data Protection Laws.

For more information about our group companies, please contact us using the details set out in this Privacy Policy.

Sharing with suppliers and other third parties

We may share your personal data with trusted suppliers, service providers and partner organisations that help us operate our business and provide our services.

For Flavour Club, this may include providers of loyalty and customer relationship management platforms, point-of-sale and ordering systems, digital wallets, website and Flavour Club Hub services, hosting and analytics services, communications platforms, and delivery or fulfilment services.

Where these organisations process personal data on our behalf, they are required to process it in accordance with our instructions, applicable Data Protection Laws and appropriate contractual obligations. We require our service providers to implement appropriate measures to protect your personal data and do not permit them to use it for their own purposes unless they have an independent lawful basis to do so.

Legal and regulatory requirements

We may disclose your personal data where necessary to comply with a legal or regulatory obligation, including to governmental bodies, regulators, law enforcement agencies, courts or tribunals.

We may also disclose personal data where necessary for the prevention, detection or investigation of crime or fraud, the prosecution of offenders, or to establish, exercise or defend legal claims.

Protecting and enforcing our rights

We may share your personal data where necessary to protect our business, our customers or others, including to enforce contractual terms, recover amounts owed to us, prevent or investigate fraud or misuse, or establish, exercise or defend our legal rights.

Changes to our business

We may share your personal data with third parties in connection with a proposed or actual sale, transfer, merger, acquisition or restructuring of all or part of our business or assets. If our business changes ownership, the new owner may use your personal data in accordance with this Privacy Policy and applicable Data Protection Laws.

5. Marketing

We may use your personal data to send you marketing about Wingstop products, offers, promotions and Flavour Club content where you have consented to receive it.

Where we send direct marketing by email, SMS or push notification, we rely on your consent. Consent is requested separately from acceptance of the Flavour Club Terms & Conditions, is specific to the relevant communication channel, and can be withdrawn at any time without affecting your Flavour Club membership.

You can withdraw your consent or change your marketing preferences at any time using the unsubscribe or opt-out mechanism provided in the relevant communication, through your Flavour Club account settings, or by contacting us using the details set out in this Privacy Policy.

Flavour Club service communications

Some Flavour Club communications are necessary to operate and administer your membership and are not direct marketing. These may include Stamp confirmations, Reward Voucher alerts and important account or expiry notices.

Members aged 16 or 17

For members aged 16 or 17, marketing is limited to Flavour Club benefits and related Wingstop restaurant offers and is not targeted using behavioural profiling. We apply age-appropriate safeguards and provide straightforward ways to stop receiving marketing at any time.

PECR and cookies

Our electronic marketing communications and our use of cookies and similar storage or access technologies are also subject to PECR. Where consent is required, we will obtain it. Where Data Protection Laws permit certain low-risk storage or access technologies without consent, we will apply the applicable requirements and safeguards.

6. International transfers

It is sometimes necessary for us to transfer your personal data to countries outside the UK. This includes sharing your data with WRI based in the USA. In such cases, we will comply with applicable UK laws designed to ensure the privacy of your personal data. Where we transfer your personal data outside the UK, we do so on the basis of an adequacy decision or (where this is not available) legally approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We have appropriate technical and organisational measures in place to protect your personal data against accidental or unlawful loss, access, use, alteration or disclosure.

Access to your personal data is limited to employees, agents, contractors and other third parties who have a legitimate business need to access it. Where they process personal data on our behalf, they must follow our instructions and are subject to appropriate confidentiality and data protection obligations.

We have procedures in place to identify, assess and respond to personal data breaches and will notify you and the relevant regulator where required by law.

8. Data retention

How long will you use my personal data for?

We retain your personal data only for as long as reasonably necessary for the purposes for which it was collected, including to meet any legal, regulatory, tax, accounting or reporting requirements. Our key retention periods are set out in the table below.

We may retain personal data for longer where necessary to investigate or respond to a complaint, establish or defend legal claims, prevent fraud or misuse, or comply with a legal or regulatory obligation.

When determining appropriate retention periods, we consider the nature and sensitivity of the data, the purposes for which it is processed, the risks associated with retaining it and any applicable legal or regulatory requirements.

Where appropriate, we may anonymise personal data so that it can no longer be associated with you. We may retain and use anonymised or aggregated information for research, analysis and statistical purposes.

Information we Collect	We keep this for
For fulfilling click and collect orders you make with our restaurants via third party food order platforms (Deliveroo and Vita Mojo)	2 years, after which it is anonymised so that it can no longer be linked to you.
For fulfilling gift card orders you make via our website via third party provider (Toggle)	2 years, after which it is anonymised so that it can no longer be linked to you.
For the protection of our employees, customers and property via the use of CCTV in our restaurants	120 days after which it is deleted.
Investigating and taking any actions in relation to health and safety incidents as required by law.	12 months after which it is deleted.
To manage our relationship with you which will include (a) Notify you about changes to our privacy policy (b) In connection with the exercise of any of your rights in relation to our processing of your personal data (c) Handling and resolving any complaints and	Indefinitely, unless you withdraw your consent and/or request us to remove the content, subject to us being required to retain such data in order to comply with our legal obligation.

(d) Asking you to leave a review or take a survey	
Manage your Flavour Club membership and our relationship with you, including administering your account and membership, notifying you of relevant changes, responding to requests or complaints, and inviting you to provide feedback or complete surveys.	2 years from your last activity with Flavour Club, after which your personal information will be deleted or irreversibly anonymised so that it can no longer be linked to you. We may retain certain information for longer where required or permitted by law, including to meet legal or regulatory obligations, prevent fraud, resolve disputes, or establish, exercise or defend legal claims.

9. Change of purpose

We will only use your personal data for the purposes for which it was collected, unless we reasonably consider that we need to use it for another purpose that is compatible with the original purpose.

If we intend to use your personal data for an unrelated purpose, we will inform you and explain the purpose and the legal basis that allows us to do so.

Where required by law, we will obtain your consent before using your personal data for a new purpose.

We may also process your personal data where required or permitted by law

10. Your legal rights

Under certain circumstances, you have rights under Data Protection Laws in relation to your personal data. You can exercise these rights by contacting us using the details set out in this Privacy Policy.

No fee usually required

You will not usually have to pay a fee to exercise your rights. However, where permitted by Data Protection Laws, we may charge a reasonable fee or refuse to act on a request that is manifestly unfounded or excessive.

What we may need from you

We may ask you for information reasonably necessary to confirm your identity and ensure that personal data is not disclosed to someone who is not entitled to receive it.

We may also ask you to clarify the information or processing activities your request relates to where this is reasonably required to respond to your request. Where permitted by Data Protection Laws, the time limit for responding may be paused while we await that clarification.

Time limit to respond

We aim to respond to valid requests without undue delay and normally within one month. In certain circumstances, including where a request is complex or you have made a number of requests, we may extend this period as permitted by Data Protection Laws. If we do so, we will let you know.

Your rights

Request access to your personal data. You can ask us for a copy of the personal data we hold about you and information about how we process it. When responding to an access request, we will carry out reasonable and proportionate searches for the personal data covered by your request.

Request correction of your personal data. You can ask us to correct personal data that is inaccurate or complete information that is incomplete. We may need to verify the accuracy of the information you provide.

Request erasure of your personal data. You can ask us to delete your personal data in certain circumstances, including where it is no longer necessary for the purpose for which it was collected, you have successfully objected to the processing, or the data has been processed unlawfully. This right is not absolute, and we may need to retain certain information where permitted or required by law. Please note that the erasure of your personal data will result in forfeiture of any status or stamps gained in the Flavour Club Loyalty program.

Object to processing. You can object to processing based on our legitimate interests where your particular circumstances give you grounds to do so. In some circumstances, we may continue processing where we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms or where processing is required for legal claims.

You have an absolute right to object to the use of your personal data for direct marketing. If you object, we will stop using your personal data for that purpose.

You may also object to profiling where it is carried out for direct marketing purposes. Where Flavour Club profiling is based on our legitimate interests, you may object to that processing based on your particular circumstances.

Request restriction of processing. You can ask us to restrict the processing of your personal data in certain circumstances, including while we verify its accuracy, where processing is unlawful but you do not want the data deleted, where you need us to retain it for a legal claim, or while we consider an objection you have made.

Request transfer of your personal data. In certain circumstances, you can ask us to provide personal data you have provided to us in a structured, commonly used and machine-readable format, or to transfer it to another organisation where technically feasible. This right generally applies where processing is automated and based on your consent or a contract with you.

Withdraw consent. Where we rely on your consent, you can withdraw it at any time. This will not affect the lawfulness of processing carried out before you withdrew your consent.

For **Flavour Club marketing**, withdrawing your consent will only affect the marketing communications you receive. It will not affect your membership or your ability to earn and redeem stamps and rewards. You can change your marketing preferences at any time using the unsubscribe option in our communications or through your account settings.