

# PRIVACY NOTICE

This Privacy Notice sets out how Lanserhof at The Arts Club uses personal data.

## WHO WE ARE

We are ArtsLans Urban Ltd trading as Lanserhof at The Arts Club, a company limited by shares incorporated in England with Company Number: 10755776.

We may be contacted by post at our registered office at Acre House, 11/15 William Road, London, United Kingdom, NW1 3ER or by email to lanserhof@theartsclub.co.uk.

We are committed to ensuring that your privacy is protected. If we ask you to provide information by which you can be identified, then you can be assured that we will only use it in accordance with this Privacy Notice.

We may change this Privacy Notice from time to time by updating it at the foot of our website homepage and all subsequent pages of [www.theartsclub.co.uk](http://www.theartsclub.co.uk) We will notify Members by email of any changes to this Privacy Notice but it is your responsibility to check this page from time to time to ensure that you are happy with our current Privacy Notice.

This policy is effective from 1st January 2019.

## WHAT INFORMATION WE MAY COLLECT AND PROCESS:

We may collect and process the following information:

Name, address, date of birth, contact information (including telephone numbers and email address), job title, employer or business details, name/address/contact details of spouse/partner/dependents, bank account details for the purpose of administrating your direct debit, CCTV footage, correspondence relating to membership and/or use of the Club and details of your personal interests should you choose to provide them.

The information we may collect may relate to:

Members, applicants and other potential or prospective Members, suppliers to the Club, or employees of the Club.

## WHY WE COLLECT INFORMATION AND WHAT WE DO WITH IT:

We gather and process this information to understand the needs of Members and to provide Members with good service at the Club.

In particular, we process this information for the following reasons:

Internal record keeping. This includes corresponding with Members; processing applications to become a Member; the administration of membership subscriptions, renewals and each Member's account at the Club; administration of bookings and charges for medical and other goods and services provided to Members at the Club; comments, complaints or changes to a Member's membership status, including termination or suspension of membership. Processing of information for this purpose is: (i) required in order to perform our contract with Members, (ii) necessary to comply with a legal obligation, and (iii) necessary for our legitimate interests (to administer our internal records and recover debts due to us).

The management and operation of the Club, the provision of its services and facilities to Members, and we will use the information to improve the Club and services and facilities which we offer Members and their guests. Processing of information for this purpose is: (i) required in order to perform our contract with Members, (ii) necessary to comply with a legal obligation, and (iii) necessary for our legitimate interests (to administer our internal records and recover debts due to us).

CCTV footage. Processing of information for this purpose is: (i) required in order to perform our contract with Members, (ii) necessary to comply with a legal obligation and (iii) necessary for our legitimate interests (to provide security at the Club).

We may use information relating to a Member to customise our Website to that Member's interests.

Information relating to our employees and suppliers is processed for our administration, personnel management and payroll purposes.

If you have indicated you wish to receive marketing emails about club events, new products or parts of the Club, special offers or other information which we think you may find interesting from us, we will use your information in order to send you these details, using the email address which you have provided. We would like to be able to contact you for market research purposes from time to time. You can change your mind at any time.

#### HOW LONG WE HOLD YOUR INFORMATION FOR:

We will hold your personal information securely in our systems for our normal information retention periods as follows:

Membership details, account details, operational information relating to membership, bookings and account administration: until the earlier of (a) 7 years from the point of collection, or (b) 12 months after the date of termination of the relevant Member's membership. In the event of a dispute or termination, we will continue to hold the information until all outstanding obligations, liabilities and any disputes have been resolved.

CCTV footage is held for a period of 30 days, at which point it will be securely deleted [except where footage is required to be retained in respect of any security-related incident at the Club].

#### WHO WE DISCLOSE INFORMATION TO:

We provide information to the following third parties, in order for them to supply services to us in relation to your membership of the Club:

The Arts Club (London) Limited, which provides the Club's internal record keeping function, and for the management and operation of the Club, including providing the Club with its membership and account administration services. We share our internal records relating to Members' memberships and accounts information with The Arts Club (London) for this purpose.

Mount Street Printers who provide printing services for envelopes and mailings from the Club. We provide Members' names and postal addresses to Mount Street Printers for this purpose.

Overthrow, who provide the login functionality on our website, and publish email campaigns to our Members. We provide Members' names and email addresses to Overthrow for this purpose.

Pearlscan, who provide a scanning service and receive hard copy application forms relating to potential Members, in order to provide us with an electronic format. We provide hard copy application forms to Pearlscan.

Jonas, who provide the membership database software, and who from time to time may access our database under our express direction to provide IT support.

The Club's personal trainers, massage therapists or our other third party service providers where a Member has booked an appointment for the relevant services. We provide the name of the Members and share appointment details with the relevant service provider.

[We do not collect any medical information relating to Members. Where a Member wishes to arrange an appointment for any medical consultations, screenings or treatments or any other services which are not included within the subscription, the relevant third party provider of those service will be responsible for notifying Members of any collection and use of their personal data relating to those services.]

We will not transfer your information to anyone outside the European Economic Area (the "EEA"). We will never sell or give your data to a third party.

## SECURITY:

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect.

## HOW WE USE COOKIES:

A cookie is a small file which asks permission to be placed on your device (eg your computer's hard drive). Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of some of the functions and features of our website.

## LINKS TO OTHER WEBSITES:

Our website may contain links to other websites of interest. However, if you use these links to leave our website, please note that we do not have any control over any other websites. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such other websites and such websites are not governed by this Privacy Notice.

You should exercise caution before clicking any links and look at the privacy statement applicable to the website in question before providing any information.

## CONTROLLING YOUR PERSONAL INFORMATION:

Under certain circumstances, you have rights under data protection laws in relation to your personal data, details of which are summarised below.

If you would like to exercise any of these rights, please contact us by writing to the Secretary at 40 Dover St, London, W1S 4NP or by email to [lanserhof@theartsclub.co.uk](mailto:lanserhof@theartsclub.co.uk).

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. If you have given us your permission to do so, we may use your personal information to send you promotional information about other services or facilities, which we offer, or about third parties which we think you may find interesting.

The Lanserhof at The Arts Club Data Protection Manager is:  
Edwina Heath, 17-18 Dover Street, London W1S 4LT / [ [e.heath@lhtac.com](mailto:e.heath@lhtac.com) ]

# YOUR LEGAL RIGHTS

You have the right to:

**REQUEST ACCESS** to your personal data (commonly known as a „data subject access request“). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**REQUEST CORRECTION** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**REQUEST ERASURE** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**OBJECT TO PROCESSING** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**REQUEST RESTRICTION OF PROCESSING** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**REQUEST THE TRANSFER** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**WITHDRAW CONSENT** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.