

THE ARTS CLUB (LONDON) LTD – PRIVACY NOTICE – UPDATED 12.03.20

Privacy Notice

This Privacy Notice sets out how The Arts Club (London) Ltd uses personal data.

Who we are:

We are The Arts Club (London) Ltd, a company limited by shares incorporated in England with Company Number: 47802 (also referred to in this Privacy Notice as the “**Club**”).

We may be contacted by post at our registered office at 40 Dover Street, London W1S 4NP or by email to secretary@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 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 was updated on 12 March 2020.

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 administering 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.

If you have applied for International Membership, this information will be shared with The Arts Club Dubai Ltd for the purposes of administering your membership of The Arts Club Dubai (please see the section “International Membership” below for more details).

The information we may collect may relate to:

Members, guests of 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 their guests and to provide Members with a better 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; comments, complaints or changes to a Member's membership status, including termination or suspension of membership.

The management and operation of the Club, the provision of its services and facilities to Members and their permitted guests, and we will use the information to improve the Club and services and facilities which we offer Members and their guests.

CCTV footage is processed in order 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 and/or from third parties, 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: 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 your 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:

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.

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

Quadranet, who provides our table reservation software, and who from time to time may access our database under our express direction to provide IT support.

Seven Rooms, who provides our table reservation software, and who from time to time may access our database under our express direction to provide IT support.

Opera, who provide the hotel room booking engine, and who from time to time may access our database under our express direction to provide IT support.

The Arts Club Dubai Ltd (please see the section “International Membership” below for more details).

Except where you have applied for International Membership (please see the section “International Membership” below for more details), we will not transfer your information to anyone outside the European Economic Area (the “EEA”).

International Membership

If you have applied for International Membership, you have agreed that we may share your personal data (in particular contact details, membership preferences and any updates to that information) with The Arts Club Dubai Ltd, in Dubai.

The purpose of this is for the Arts Club Dubai Ltd to manage the administration of your membership of The Arts Club Dubai. Please refer to the Privacy Notice of The Arts Club Dubai Ltd at www.theartsclub.ae for further details.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. The Arts Club Dubai Ltd has entered into a contract with us based on the “model contractual clauses” approved by the European Commission, obliging it to protect your personal data.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contact us” section below.

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

We will not sell, distribute or lease your personal information to third parties other than as we have outlined above (please refer to “Who we disclose your information to” and “International Membership”) 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.

Under certain circumstances, you have the right to:

- (a) request access to and a copy of personal information which we hold about you by writing to the Secretary at 40 Dover St, London, W1S 4NP or by email to secretary@theartsclub.co.uk. This is commonly called a “data subject access request”;
- (b) request correction of your personal information if you believe that any information we are holding on you is incorrect or incomplete. If you believe this is the case, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect;
- (c) request that your personal information is erased. You may ask us to delete your personal information where there is no suitable reason for us continuing to use it, or where you have objected to our processing of it (see below);
- (d) object to the processing of your personal information if we are relying on a legitimate interest (or the legitimate interest of a third party) and you would like to object to the processing of your personal information on this ground, or where we are processing your personal information for direct marketing purposes;
- (e) restrict or suspend the processing of your personal information;

(f) Complain to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk).

You may choose to exercise your rights restrict our collection or use of your personal information by contacting us in the following ways:

- (a) by telephoning the membership office on 020 7499 8581, option 3;
- (b) by writing to or emailing us at membership@theartsclub.co.uk.

If you wish to lodge a complaint about the manner in which The Arts Club handles your data, you may do so to the Secretary of the Club by email to secretary@theartsclub.co.uk. We would appreciate the chance to deal with your concerns before you approach the Information Commissioner's Office, but should the matter require escalation you are advised to contact the ICO through www.ico.org.uk

The Arts Club Data Protection Officer: Mr Tobias Walter, 40 Dover Street, London W1S 4NP / tobias@theartsclub.co.uk

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