

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

2. Credit

This document was created using a template from SEQ Legal (<https://seqlegal.com>).

3. How we use your personal data

- 3.1 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our Google analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.2 We may process your account data ("**account data**"). The account data may include your name and email address. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you and managing our relationship with you. The legal bases for this processing are: (a) our legitimate interests, namely website security and managing our business; (b) the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; and (c) to comply with a legal obligation, such as notifying you about changes to the terms of our privacy policy.
- 3.3 We may process your personal data that you provide in the course of the use of our services ("**service data**"). The service data may include your name, telephone number and email address(es). The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal bases for this processing are: (a) our legitimate interests, namely the security of our website and managing our business; (b) our performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; and (c) to comply with a legal obligation, such as notifying you about changes to our privacy policy.
- 3.4 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of: (a) offering our services which we believe will be of interest to you, to you; (b) delivering relevant website content and advertisements to you in respect of our services; and (c) monitoring and understanding the effectiveness of the advertising we send you, to better develop customer relationships and experience. The legal bases for this processing are: (a) the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; and (b) our legitimate interests, namely managing our business.
- 3.5 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to the third parties listed below and any other third parties notified to you, for the purposes stated in paragraph 3 above, and insofar as reasonably necessary in order to obtain or maintain insurance coverage, manage risks or obtain professional advice. The legal bases for this processing are: (a) to comply with a legal obligation; and (b) our legitimate interests, namely to protect our business:
 - (a). professional advisers, including lawyers, bankers, auditors and insurers based in the UK;
 - (b). regulators and other authorities who require reporting of processing activities in certain circumstances;

- (c). third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy;
- (d). fraud prevention agencies.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

- 4.2 If you are a client of The London Residents Club Ltd and have signed a contract to that effect, we may disclose your address to our suppliers or subcontractors insofar as reasonably necessary for the purpose of carrying out our business in performance of a contract with you.
- 4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International Transfers

- 5.1 We may transfer your personal data to third parties based outside the European Economic Area (“EEA”) for the purposes set out in this Policy.
- 5.2 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - (a). We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
 - (b). Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
 - (c). Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6. Change of Purpose

- 6.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing is compatible with the original purpose, please contact us.
- 6.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 6.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 Retaining and deleting personal data

- 7.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.2 Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:
 - (a). to the extent that we are required to do so by law;
 - (b). if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
 - (c). in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

7.3 We may retain anonymised data for longer periods for research or statistical purposes. Anonymised data is not treated as personal data in law, insofar as it does not directly or indirectly reveal your identity.

8. Amendments

8.1 We may update this policy from time to time by publishing a new version on our website.

8.2 You should check this page frequently to see any updates or changes to this policy.

8.3 If we consider it appropriate, we may notify you of changes to this policy by email.

9. Your rights

9.1 In this Section 8, we have summarised the rights that you have under data protection law, being the Data Protection Act 1998 and the General Data Protection Regulation ((EU) 2016/679) (the “GDPR”).

9.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

9.3 You may instruct us to provide you with any personal information we hold about you. This is known as a “data subject access request”. Provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill, dated within the last three months preceding the data subject access request and showing your current address). Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by emailing our data protection officer (details below). We may withhold personal information that you request to the extent permitted by law.

9.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

9.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include when: (a) the personal data held is no longer necessary for the purposes for which they were collected or otherwise processed; (b) you withdraw consent to consent-based processing; (c) you object to the processing under certain rules of applicable data protection law; (d) the processing is for direct marketing purposes; or (e) the personal data have been unlawfully processed. However, there are exclusions from the right to erasure. The general exclusions include where processing is necessary; (a) for exercising the right of freedom of expression and information; (b) for compliance with a legal obligation; or (c) for the establishment, exercise or defence of legal claims.

9.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: (a) you contest the accuracy of the personal data; (b) processing is unlawful but you oppose erasure; (c) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and (d) you have objected to processing, pending the verification of that objection. Where processing has been restricted on any of these bases, we may continue to store your personal data. However, we will only otherwise process it: (a) with your consent; (b) for the establishment, exercise or defence of legal claims; (c) for the protection of the rights of another natural or legal person; (d) or for reasons of public interest.

9.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: (a) the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or (b) the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

9.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

- 9.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 9.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means,

you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 9.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioner's Office, the UK supervisory authority for data protection issues. Further information can be found at www.ico.org.uk. We would, however, appreciate you contacting us in the first instance.
- 9.12 You may exercise any of your rights in relation to your personal data by contacting our data protection officer (details below).

10. Links to and from our website

Our site may, from time to time, contain links to and from the websites of our partners 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.

11. Marketing

- 11.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.
- 11.2 We may use your identity, contact details, usage data, technical data and marketing preferences to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.
- 11.3 You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.
- 11.4 We will get your express opt-in consent before we share your personal data with any company outside The London Residents Club Limited's group for marketing purposes.
- 11.5 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.
- 11.6 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

12. About cookies

- 12.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 12.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 12.3 The cookies we use do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.
- 12.4 You can restrict, block or delete the cookies which are set by any websites by changing your internet browser settings. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website. If you delete cookies relating to this website we will not remember things about you, including your cookie preferences, and you will be treated as a first-time visitor next time you visit the site.

13. Cookies that we use

- 13.1 Our website uses cookies to let users navigate around the website and (where appropriate) let us tailor the content to fit the needs of our site's visitors. Without cookies enabled we can't guarantee that the website and your experience of it are as we intended it to be. Cookies help us provide you with a good experience when you browse our website. None of the cookies we use collect your personal information and they can't be used to identify you.
- 13.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about our website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

14. Third Party cookies

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

15. Our details

- 15.1 This website is owned and operated by The London Residents Club Limited.
- 15.2 We are registered in England and Wales under registration number 09078127, and our registered office is at 26 Astwood Mews, London, SW7 4DE.
- 15.3 Our principal place of business is at 26 Astwood Mews, London, SW7 4DE.
- 15.4 You can contact us:
 - (a) by post, to the postal address given above;
 - (b) using our website contact form;
 - (c) by telephone, on the contact number published on our website; or
 - (d) by email, using enquiries@thelondonresidentsclub.com

16. Data protection officer

- 16.1 Our data protection officer's contact details are: jeremy@thelondonresidentsclub.com.