

# Member Privacy Notice

## 1. Introduction

- a. This Privacy Notice sets out how Grosvenor West End Properties, 70 Grosvenor Street, London, W1K 3JP, company number 00956235 (“**Owner**”) named in your Customer Agreement, uses and protects the personal information that you provide to us, or that is otherwise obtained or generated by us, in connection with the Customer Agreement. For the purposes of this Privacy Notice (unless expressly stated, or the context requires, otherwise), ‘**we**’, ‘**us**’ and ‘**our**’ refers to the Owner and ‘**you**’ or ‘**your**’ refers to you, the Member.
- b. This Privacy Notice explains the following:
  - what personal information we process about you;
  - how we keep your personal information safe;
  - how we use your personal information;
  - who we share your personal information with; and
  - your rights regarding your personal information.
- c. The Owner is the data controller in respect of your personal information for the purposes of applicable data protection legislation.
- d. **Please note:** this Privacy Notice does not cover third party websites that we may link to from our website, unless specifically mentioned in this Privacy Notice. We are not responsible for the privacy policies and practices (including use of cookies) of such third parties even if you accessed the third party website using links from our website. We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

## 2. The personal information we collect and how we use it

Under applicable data protection legislation, we are required to explain what information we collect about you and how and why we use your personal information. We are also required to have a "lawful basis" on which to process your personal information. This is set out in the table below. You do not have to provide any personal information that we request from you, but it may not be possible for us to enter into the Customer Agreement with you if that personal information is not provided.

<b>Processing activity: Why we use your information?</b>	<b>What information is collected?</b>	<b>Lawful basis of processing</b>	<b>Where is the information collected from?</b>
<p>To administer the terms of the Customer Agreement, including billing of sums payable under the Customer Agreement or refunding the appropriate portion of your deposit on termination or expiry of the Customer Agreement</p>	<p>Your name; email address; postal address; telephone and mobile number; bank account details; photograph (for your membership card); identifiers from your passport, driving licence or other ID card; details of your guests who may access our premises.</p> <p>In addition to the above, we also collect any information you volunteer to us when you email or call us.</p>	<p>For the purposes of our legitimate interests in complying with our obligations under the Customer Agreement</p>	<p>From you or the company engaged by us to operate and manage our premises (the “Operator”)</p>
<p>To comply with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and to comply with any court process in connection with any litigation</p>	<p>Your name; email address; postal address; telephone and mobile number; bank account details; identifiers from your passport, driving licence or other ID card; details of your guests who may access our premises; any other information relevant to the request or litigation</p>	<p>To comply with our legal obligations or for the purpose of our legitimate interests in enforcing the terms of the Customer Agreement</p>	<p>From you or the Operator, or collected by us or our legal advisors</p>
<p>To comply with our statutory and regulatory obligations including carrying out background checks relating to you prior to you entering into</p>	<p>Your name; email address; postal address; telephone and mobile number; bank account details; identifiers from your passport, driving licence or other ID card</p>	<p>To comply with our legal obligations</p>	<p>From you or the Operator</p>

the Customer Agreement (including anti-money laundering, financial and credit checks)			
To enforce the terms of the Customer Agreement	Your name; email address; postal address; telephone and mobile number; bank account details; identifiers from your passport, driving licence or other ID card; details of your guests who may access our premises	For the purposes of our legitimate interests in enforcing the terms of the Customer Agreement	From you or the Operator
To notify you about changes to the Customer Agreement	Your name; email address; postal address; telephone and mobile number	For the purposes of our legitimate interests in complying with our obligations under the Customer Agreement	From you or the Operator
To arrange our access to your property as and when required, including where our access is required for us to comply with our legal obligations	Your name; email address; postal address; telephone and mobile number	To comply with our legal obligations or for the purpose of our legitimate interests in enforcing the terms of the Customer Agreement	From you or the Operator
To monitor access to our premises to ensure the safety and security of our premises	CCTV images and video recordings; photograph (for your membership card); details of your guests who may access our premises	For the purposes of our legitimate interests in ensuring the safety and security of our premises	Generated by us

<p>To send you marketing communications about news, events, products and services that we believe may be of interest to you</p>	<p>Your name; email address; details of the products and services that you specify in your marketing preferences</p>	<p>On the basis of your consent. You may withdraw such consent at any time and choose not to receive such marketing communications from us by either selecting the unsubscribe option at the bottom of each communication that we send to you or by contacting us using the details in section 9</p>	<p>From you or the Operator</p>
<p>To create promotional videos for our premises</p>	<p>Image and video recordings</p>	<p>On the basis of your consent. You may withdraw such consent at any time by contacting us using the details in section 9</p>	<p>From you and generated by us</p>
<p>To undertake any activities connected with any sale, merger, acquisition, disposal,</p>	<p>Your name</p>	<p>For the purposes of our legitimate interests in undertaking such activities</p>	<p>From you or the Operator</p>

reorganisation or similar change of our business			
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We have determined, acting reasonably and considering the circumstances, that we are able to rely on legitimate interests as the lawful basis on which to process your personal information in certain circumstances (we have stated this above and set out our legitimate interests). We have reached this decision by carrying out a balancing exercise to make sure our legitimate interest does not override your privacy rights as an individual.

We consider that it is reasonable for us to process your information for the purposes of our legitimate interests outlined above as: (a) we process your information only so far as is necessary for such purpose; and (b) it can be reasonably expected for us to process your information in this way.

### 3. Retention of your personal information

Your personal information is retained by us in accordance with applicable law and regulatory guidance. Our data retention periods vary depending on the nature and context of the personal information that we have in our care, and are calculated taking into account the following factors:

- potential claims or litigation;
- guidance from official bodies such as relevant data protection supervisory authorities and professional regulatory bodies;
- how long we need to keep the data to fulfil the purpose for which it was collected;
- the nature and sensitivity of the data; and
- legal obligations to which we are subject.

This means that, in general, we delete personal information when: the purpose for its processing has been fulfilled or the contractual relationship with you has ended; all mutual claims have been fulfilled; and there are no other legal obligations requiring us to retain the personal information.

Please contact us if you wish to know more about our retention practices using the details in section 9.

### 4. Keeping your personal information safe

#### Where the personal information is held

- We store your personal information on our property management software system, our internal electronic file storage and Outlook.

- The systems we use are secure and comply with industry standards. Access to our systems is limited to representatives of the Owner and the Operator, as well as certain of our other service providers (see section 5).

We have in place appropriate policies, rules and technical and organisational measures to protect your personal information from unauthorised or unlawful processing, and against accidental loss, destruction or damage.

We also have procedures in place to deal with any data security breach. We will notify you and any applicable regulator of a data security breach where we are legally required to do so.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not completely secure and for this reason we cannot guarantee the security or integrity of any personal information that are transferred from you or to you via the internet; any transmission is at your own risk.

## **5. Who we may share your personal information with**

We may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described in section 2:

- the Operator to enable the Operator to operate and manage our premises on our behalf;
- other members of our company groups and their respective employees;
- our service providers, including referencing and credit check companies, legal and financial advisors, managing agents, management surveyors, insurance brokers, debt recovery agents and hosting service providers;
- local and foreign regulators, governments, law enforcement authorities, local and foreign courts, tribunals and arbitrators and other judicial committees for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters; and
- persons connected with any sale, merger, acquisition, disposal, reorganisation or similar change to our business (including any potential or actual purchaser and that purchaser's advisors).

All third parties to whom we transfer personal information relating to you will be under an obligation to protect the confidentiality and security of that personal information.

## **6. International transfers of your personal information**

We may process your personal information in countries other than the country in which the data was originally collected (for example, outside the UK/EEA) in order to provide you with our services. These countries may not have the same data protection laws as the country in which you initially provided the information and may not provide the same level of protection.

Where your personal information is transferred overseas by us or our service providers, we use (or confirm that our service providers use) appropriate safeguards to protect your personal information to a standard essentially equivalent to the law applicable in the country in which you are resident. You may obtain information about, and a copy of, the relevant safeguard relied upon by us for the transfer of your personal data by contacting us via the details set out in section 9.

## 7. Your rights regarding your personal information

Right	Description
<b>To be informed</b>	A right to be informed about the personal information we hold about you.
<b>Of access</b>	A right to access the personal information we hold about you.
<b>To rectification</b>	A right to require us to rectify any inaccurate personal information we hold about you.
<b>To erasure</b>	<p>A right to ask us to delete the personal information we hold about you. This right will only apply where (for example):</p> <ul style="list-style-type: none"> <li>• we no longer need to use the personal information to achieve the purpose we are processing it for;</li> <li>• where you withdraw your consent if we are using your personal information based on your consent; or</li> <li>• where you object to the way we process your data (in line with the right to object set out below).</li> </ul>
<b>To restrict processing</b>	<p>In certain circumstances, a right to restrict our processing of the personal information we hold about you. This right will only apply where (for example):</p> <ul style="list-style-type: none"> <li>• you dispute the accuracy of the personal information held by us;</li> <li>• where you would have the right to ask us to delete the personal information but would prefer that our processing is restricted instead; or</li> <li>• where we no longer need to use the personal information to achieve the purpose we process it for, but you need the data for the purposes of establishing, exercising or defending legal claims.</li> </ul>
<b>To data portability</b>	<p>In certain circumstances, a right to receive your personal information, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal information to another organisation, at your request.</p>
<b>To object</b>	<p>A right to object to our processing of the personal information we hold about you where our lawful basis is for the purpose of our legitimate interests, unless we are</p>

able to demonstrate, on balance, legitimate grounds for continuing to process the personal information which override your rights or which are for the establishment, exercise or defence of legal claims.

**In relation to automated decision making and profiling**

A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affects you.

**To withdraw**

A right to withdraw your consent, where we are relying on it to use your personal information (for example, to send marketing to you).

- Please contact us if you wish to exercise any of these rights using the details in section 9.
- If you have a complaint about how we manage your personal information, please contact us (using the details in section 9). You can also complain to the Information Commissioner's Office by telephone on 0303 123 1113 or through the following link: <https://ico.org.uk/global/contact-us/email/>

**8. Changes to this Privacy Notice**

We will review and may update our Privacy Notice from time to time. We will provide you with a copy of this Privacy Notice when you first become a member with us. All important changes made to our Privacy Notice will be notified to you by email.

This Privacy Notice was last reviewed and updated in April 2023.

**9. Contact**

If you have any questions, complaints, comments or requests regarding any aspect of this Privacy Notice, please do not hesitate to contact us at: [dataprotectionGBI@grosvenor.com](mailto:dataprotectionGBI@grosvenor.com)