



## **PRIVACY POLICY**

### **1. Introduction**

- 1.1 For any private members club, privacy and the protection of personal information is naturally of the utmost importance. The South Kensington Club (“SKC”, “the Club”, “we”, or “us”) collects personal information in the course of business in relation to its members and their guests. More detailed information on who we are can be found in section 8 below.
- 1.2 This Privacy Policy (“this Policy”) outlines why we collect this information, what we do with it, and your rights over that information. This Policy is produced and published in accordance with the General Data Protection Regulations (“the GDPR”).

### **2. What are the legal grounds for processing your data?**

- 2.1 The GDPR provides the following grounds as legal justification for processing your personal information. These grounds form the overarching guiding principles for the rest of this Policy. They are:

#### **2.1.1 Consent**

The primary basis for processing your data is that you have given your consent for the Club to do so, for example in opting-in to receive promotional e-mails about offers and events at the Club. You may withdraw consent at any time by e-mailing [data.protection@southkensingtonclub.com](mailto:data.protection@southkensingtonclub.com) or, in the case of marketing e-mails, by following the links to unsubscribe at the bottom of the e-mail.

#### **2.1.2 Contract**

This applies where there is a contract between the Club and an individual and the Club needs to process personal data under that contract, for example in creating and managing a membership, reservation, or event booking.

### 2.1.3 Legal Obligation

This applies where the Club is required by law to process personal data, for example in providing CCTV footage to the police in connection with the investigation of a criminal offence.

### 2.1.4 Vital Interests

The Club will process information on this basis where it seeks to protect the vital interests of an individual, for example in safeguarding their health, wellbeing, or safety.

### 2.1.5 Legitimate Interest

This basis applies in cases where the Club has a legitimate interest in processing personal information and that interest is not outweighed by an individual's fundamental rights and freedoms. An example of this would be where an enquiry is made to the Club and we need to retain your personal information so that we can respond to that enquiry. Where we process data under this ground, we do so after conducting a Legitimate Interests Assessment, details of which can be obtained from [data.protection@southkensingtonclub.com](mailto:data.protection@southkensingtonclub.com).

## 3. What data do we collect?

3.1 We only collect the data we need to. Since we offer a broad range of services, this data can be similarly broad in nature. The following is a non-exhaustive list of the types of information we may collect, including your:

- Name;
- Gender;
- Image;
- Date of birth,
- Postal address,
- E-mail address;
- Telephone number;
- Medical information;
- Username;
- Bank account details; and
- Credit card details.

#### **4. How and why do we collect this information?**

- 4.1 We collect personal data through a range of methods and sources, both physical and electronic, for example where it is provided by you:
- Upon signing up for or updating the details of a membership;
  - Where necessary as a guest, for example to receive spa services;
  - To sign up for marketing so you can stay informed with what's on at SKC;
  - When you contact us with an enquiry; or
  - When you sign in for an event.
- 4.2 We also collect limited data in our dealings with our partners and reciprocal clubs. We require that all our partners and reciprocal clubs adhere to the same strict data protection standards that we do and respect the preferences of the individuals whose data is passed to us.
- 4.3 Our website uses Google Analytics. We do not make personally identifiable information available through this tool and it is used only to better understand the users of our website.
- 4.4 The reason we collect personal data is so that we can carry on our business as a private members club, providing the best possible experience to our members and guests.

#### **5. What do we do with your information?**

- 5.1 Most of the time, we use your information simply to stay in touch, for example in connection with your membership, to help with an enquiry, or to keep you informed of promotions and events.
- 5.2 We may also use your data behind the scenes, for example:
- To administer memberships;
  - In the sale of goods and services, such as food or drinks at the Club;
  - For reporting purposes, so that we can continue to innovate and deliver to the benefit of our members and their guests;
  - To meet legal obligations, for example in the prevention or investigation of a crime; or
  - For internal auditing purposes.
- 5.3 We will only pass on your data to a third party or if we have either received your consent or we are obliged to do so under one of the grounds in section 2 above. We will never sell any personal data whatsoever.
- 5.4 Personal data is stored securely for a maximum of seven years after the last date on which that data was used, after which it is purged. There are limited exceptions to this timeframe, for example where such data needs to be kept for legal purposes.

## **6. How do we keep your data safe?**

- 6.1 In storing your personal data, we will always do so in strict compliance with the requirements of the GDPR and any other data protection legislation that may come into effect from time to time.
- 6.2 In practice, this means that any electronic information is stored and processed through a secure server with a maintained firewall. Physical information, such as membership application forms, are kept in a secure, locked portion of the Club. Card payments are processed in compliance with Payment Card Industry Data Security Standards.
- 6.3 Personal data for prospective, current, and past members is maintained through a program called MindBody. Their servers are located in the United States of America and processing some personal data involves the transfer of personal data cross-border and out of the European Economic Area. To provide the appropriate level of protection, MindBody is accredited with the EU-U.S. Privacy Shield Framework, which is fully compliant with the requirements of the GDPR.
- 6.4 In the unlikely event of a breach of the security of data, we will notify members promptly as well as informing the Information Commissioner's Office ("the ICO").

## **7. CCTV Images**

- 7.1 We record CCTV in and around the Club in the interests of safety and the prevention of crime, in line with our licensing conditions as imposed by the Royal Borough of Chelsea and Kensington. Images are stored on-site on a password-protected unit.
- 7.2 Images and recordings are stored for a week and then over-written. Any complaints or data requests which rely on CCTV must therefore be made within this timeframe prior to automated deletion.
- 7.3 Where necessary or required, and in accordance with the legal grounds in section 2 above, we may share CCTV with:
  - 7.3.1 Data subjects, in accordance with a valid data request;
  - 7.3.2 SKC employees and agents;
  - 7.3.3 Service providers;
  - 7.3.4 The police;
  - 7.3.5 External security organisations;
  - 7.3.6 Other authorised persons, in accordance with a valid data request.

## **8. What are your rights?**

8.1 Under the GDPR, you have the following rights in respect of your data:

8.1.1 To access your personal data;

8.1.2 To be provided with information about how your personal data is processed;

8.1.3 To have your personal data corrected;

8.1.4 In certain circumstances, to have your personal data erased;

8.1.5 In certain circumstances, to object to or restrict how your personal data is processed;

8.1.6 To withdraw consent, if your data is being processed on the ground of consent;

8.1.7 To lodge a complaint with the Information Commissioner's Office, details of which can be found in section 9 below.

## **9. Who are we?**

9.1 The South Kensington Club is the trading name of the South Kensington Club group of companies, namely:

9.1.1 South Kensington Club Limited, with company number 08798395 and registered offices at The Courtyard, 14a Sydenham Road, Croydon, England, CR0 2EE.

9.2.2 Fortevita Limited, with company number 08330085 and registered offices at 38-42 Harrington Road, London, SW7 3ND.

9.3.3 Challenger House Limited, with company number 08548009 and registered offices at 17 Queensberry Mews West, London, England, SW7 2DY.

9.2 Our contact details are:

Telephone: 0203 006 6868

E-mail: [data.protection@southkensingtonclub.com](mailto:data.protection@southkensingtonclub.com)

Post: 38-42 Harrington Road, London, SW7 3ND

**10. What to do if you have questions about your personal data?**

- 10.1 In demonstration of our commitment to privacy, we have appointed a Data Protection Officer (“DPO”). This is the Deputy General Manager, who is the designated “controller” of all personal data that we hold about members and other individuals.
- 10.2 If you would like to receive further information about how we process personal data or wish to make a complaint, please do not hesitate to get in touch with our DPO at [data.protection@southkensingtonclub.com](mailto:data.protection@southkensingtonclub.com).
- 10.3 Alternatively, you can contact the ICO using the contact details on their website, [www.ico.gov.uk](http://www.ico.gov.uk).

**11. Miscellaneous**

- 11.1 We reserve the right to amend this Policy from time to time without notice. The most up to date version will be available on our website at [www.southkensingtonclub.com](http://www.southkensingtonclub.com) or can be requested from the DPO at [data.protection@southkensingtonclub.com](mailto:data.protection@southkensingtonclub.com).
- 11.2 For further details about the GDPR, please visit the ICO website, [www.ico.gov.uk](http://www.ico.gov.uk).

May 2018