



**TEN TRINITY SQUARE**  
PRIVATE CLUB

**PRIVACY POLICY**

Please read this “Privacy Policy” (“**Policy**”) carefully to understand how and why Ten Trinity Square Club Limited of 10 Trinity Square, London, EC3N 4AJ (the “**Club**”, “**we**”, “**our**” and “**us**”) use your personal data:

- (1) when you visit our website at <https://club.tentrinitysquare.com/> (the “**Site**”);
- (2) when as a candidate for membership (“**Candidate**”) we are processing your application for membership,
- (3) where you are an existing member of the Club (“**Member**”), when we are facilitating your membership;
- (4) where you have been identified by a Member as their assistant on their ‘Application for Membership’ form (an “**Assistant**”) or
- (5) where you are a guest of one of our Members (a “**Guest**”) and visiting the Club premises.

The Club is a “controller” in relation to its use of your personal data. This is a legal term – it means that we make decisions about how and why we use your personal data and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws. Your privacy is important to us.

**Information we collect from you and where we collect it from**

We collect your personal data from various sources. Below we set out the different types of personal data that we collect through the Site and selected other sources.

**(a) Information we collect about you. –**

**Through your use of the Site:**

With regard to each of your visits to our Site we may automatically collect the following information:

- (i) Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, operating system and platform; and
- (ii) Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); device type; unique device identifiers; device settings; and geo-location data; residences you viewed or searched for; page response times; download errors; length of visits to certain pages; the time and date of your visit; page interaction information (such as scrolling, clicks, and mouse-overs); methods used to browse away from the page; and any phone number used to call our customer service number.

**When you visit the Club premises:**

- (i) We will collect your name and signature upon entry via our Log Book, which will also indicate your time of arrival. You may also be asked to provide your Membership Card. The Membership Card can also be used to enter the club via the Scenic Lift Entrance. The information is only used for occupancy and usage purposes.
- (ii) We will collect the names of your guests when they enter the club. This information is used for occupancy purposes and emergency response scenarios.

(iii) [With regard to your visits to the Club premises, we operate CCTV cameras, for security purposes, which will capture your image. Images collected shall not be shared or otherwise disclosed for commercial or entertainment purposes.]

### **(b) Information you give us directly.**

You also give us information about you by filling in forms on our website or through hard-copy application forms, or by corresponding with us by phone, e-mail, on the Site or otherwise. This includes information you provide when you register on our website or apply for membership and includes your name, address, company, e-mail address and phone number (see the below for more detail).

#### **When you submit/are named in an “Application for Membership” form:**

1. from Candidates who may or may not subsequently become Members:

- Title
- First Name
- Middle Name(s)
- Family Name
- Nationality
- Date of Birth
- Home Address
- Occupation or Profession
- Business Name
- Business Address
- Preferred Address of Correspondence
- Telephone number
- Mobile number
- Personal Email
- Business Email
- Marketing Preferences
- Details of any other clubs of which you are a member
- Details of any interests in the following categories: Business; Cuisine; Wine; Culture; Literature; Charity
- Details of how the you feel would contribute to life of the Club
- Details of how you heard about the Club
- Signature

2. from an Assistant to a Candidate/Member (when a Member provides these details in their Application for Membership):

- Full Name
- Telephone number
- Email Address

Where you are a Member whose application has been successful:

- All items listed above in item 1 as being collected from you as a Candidate
- Financial data (including payment card details/bank account)
- Membership Subscription data (including category of membership you have purchased and your membership renewal date)

[When you register for the Members' portal on our Site:

- Membership profile data (including your username and password, your interests, preferences)]

#### **How we use your information and our legal bases for processing**

We use your information for a number of different purposes in connection with your use of the Site and your Membership / other interactions with the Club. We must always have a “lawful basis” (i.e. a reason, prescribed by law) for processing your personal data. The **personal data purposes table** below sets out the purposes for which we process your personal data and the corresponding lawful basis for that processing.

Purposes of processing	Your consent	To perform a contract with you	To comply with a legal obligation	For legitimate interests	Details of our legitimate interests (where relevant)
<b>Contact information (including name, telephone number, email address and physical addresses)</b>					
Responding to your enquiries (including any contact you make via the Site that is not associated with a pre-existing relationship with us as customer/ supplier or otherwise)		✓	✓	✓	It is important that we can identify you and respond to your enquiries.
Establishing you as a Candidate/ Member on our systems		✓			
Confirming and processing membership applications, subscriptions and renewals (either as customer or supplier)		✓			
Sending you information (including direct marketing) as set out in the “Marketing” section below	✓			✓	It is important to keep you notified of club news, factual updates to our engagement with you as well as to inform you of any latest offers and promotions.
<b>Website Information</b>					
Ensure the operation and performance of the Site (Please also see the “Cookies” section below)				✓	We need to ensure the Site functions correctly.
To improve the functionality of the Site				✓	It is in our interest to keep the Site up to date and improve its functionality for the benefit of users.
Monitoring and producing statistical information regarding the use of our platforms, and analysing and improving their functionality.				✓	We need to perform this routine monitoring to make sure our platforms work properly, analyse how they are used and improve them.
To enable you to create Member accounts and log-in to them via the Site				✓	It is in our interests to grant you access to a private log-in where you can access information relevant to you and your relationship with the Club.

Purposes of processing	Your consent	To perform a contract with you	To comply with a legal obligation	For legitimate interests	Details of our legitimate interests (where relevant)
To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you				✓	It is important that we are able to measure the effectiveness of our marketing and assess whether particular marketing will be of relevance to your interests.
<b>Candidate/Member Information</b>					
Considering the information you provide in your Application for Membership to assess your application to become a Member		✓			
Taking payment from you in respect of your membership subscription / any other services you purchase from us		✓			
Hosting you at the Club and providing hospitality services				✓	We need to be able to host our Members and their Guests effectively.
Conducting surveys for benchmarking, continuous improvement and marketing purposes	✓			✓	We need to collect your feedback in relation to our services, in order to resolve any problems or complaints and improve and innovate.
For our general record-keeping and Member relationship management		✓		✓	We need to store Member related information so we can refer back to it.
Managing and administering the user accounts and profiles you have with us, collecting information about how you use them and your preferences and tailoring and improving our services accordingly	✓			✓	We need to tailor our services in accordance with feedback and preferences.
Continuously reviewing and improving our products and services (including by seeking and obtaining your feedback) and developing new ones				✓	We need to tailor our services in accordance with feedback and preferences.
<b>Guests</b>					
For our general record-keeping and understanding of occupancy of the Club.			✓	✓	We need to tailor our services in accordance with feedback and preferences.

Purposes of processing	Your consent	To perform a contract with you	To comply with a legal obligation	For legitimate interests	Details of our legitimate interests (where relevant)
<b>General Club Requirements</b>					
Analysing how our electronic marketing communications are used by you (including whether you open them and click through to access their contents)				✓	We need this information to ensure we are providing you with information that you are interested in.
Managing, planning and delivering our marketing strategies (including recording and reporting on our business development activities)				✓	We need to implement effective business development and marketing strategies.
Monitoring our systems and processes to identify, record and prevent fraudulent, criminal and/or otherwise illegal activity			✓	✓	We need to be able to monitor our systems in this way to help protect them, us and you from illegal activity.
Purchasing, maintaining and claiming against our insurance policies			✓	✓	It is in our interests to protect our business against specified losses.
Complying with our general regulatory and statutory obligations			✓		
Complying with instructions, orders and requests from law enforcement agencies, any court or otherwise as required by law			✓		
Obtaining legal advice and establishing, defending and enforcing our legal rights and obligations in connection with, any legal proceedings (including prospective legal proceedings)				✓	We must be able to establish and defend our legal rights and understand our obligations, and seek legal advice in connection with them.
Training our staff			✓	✓	Sometimes, it is appropriate for us to use your personal data so that we can provide our staff with training to manage risk and improve the quality of our services.
Managing the proposed sale, restructuring, transfer or merging of any or all part(s) of the Club, including to respond to queries from the prospective buyer or merging organisation			✓	✓	We have a legitimate interest in being able to sell any part of our business.

Purposes of processing	Your consent	To perform a contract with you	To comply with a legal obligation	For legitimate interests	Details of our legitimate interests (where relevant)
Maintaining the security and integrity of our systems, platforms, premises and communications (and detecting and preventing actual or potential threats to the same)		✓		✓	We need to make sure that our business processes are secure.
To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws.			✓		
Resolving any complaints from or disputes with you		✓		✓	We need to be able to try and resolve any complaint or dispute you might raise with us.

## **Aggregated / Anonymised data**

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand and improve the use of our Site.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your name, contact details (email address, telephone number and postal address), technical/usage information collected when you visit our Site, as well as any profile data you provided in your Application for Membership 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 (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased a membership with the Club and you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences OR by following the opt-out links on any marketing message sent to you OR by contacting us at any time].

Where you opt out of receiving these marketing messages, this will not apply to the sending of

service-related messages which are relevant to your membership.

## **Cookies**

We use “cookies” to collect information about you and your activity across our Site. A cookie is a small piece of data that our website stores on your computer, and accesses each time you visit, so we can understand how you use our Site. This helps us serve you content based on preferences you have specified. Please refer to our Cookie Policy for more information.

## **Disclosure of your information**

From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our Site and IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third party service providers include our Membership System, Concept.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is in relation to:

- services provided to you or us by a third party acting independently to us but which has a relationship with us, for example certain payment fraud checking services;
- the purchase or sale of our business (or part of it) in connection with a share or asset sale, for which we may disclose or transfer your personal data to the prospective seller or buyer and their advisors; and
- the disclosure of your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- IT support, Site and data hosting providers and administrators;
- payment processors in relation to purchases you make with us;
- consultants and professional advisors including legal advisors and accountants;
- courts, court-appointed persons/entities, receivers and liquidators;
- business partners and joint ventures;
- insurers; and
- governmental departments, statutory and regulatory bodies (including tax authorities).

### **Where we store your personal data**

We will sometimes need to transfer the personal data that we collect from you to recipients (either internally or externally) in jurisdictions other than your own and from inside the European Economic Area (“EEA”) to a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Some of these jurisdictions may not provide the same level of protection to your personal data as provided in your jurisdiction.

If you are located in Europe and we transfer your personal data outside the EEA, we will only make that transfer if:

- that country ensures an adequate level of protection for your personal data;
- the recipient or recipient country is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments which amount to appropriate safeguards for your personal data – this includes for example, the EU-US Privacy Shield which enables the secure transfer of personal data to the United States;
- we have put in place appropriate safeguards to protect your personal data, such as a contract with

the person or entity receiving your personal data which incorporates specific provisions as directed by the European Commission;

- the transfer is permitted by applicable laws; or
- you explicitly consent to the transfer.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **How long do we keep your information for?**

We will only retain your personal data for a limited period of time, and for no longer than is necessary for the purposes for which we are processing it for. This will depend on a number of factors, including:

- any laws or regulations that we are required to follow;
- whether we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.
- the period of time during which any claims or proceedings can be brought against us or a member of the group to defend against any such claims.

For more information on our data retention practices, please contact [reception@tentrinitysquare.com](mailto:reception@tentrinitysquare.com)

### **What are your privacy rights and how can you exercise them?**

You may access the personal data about you that we store. You may also review or make certain corrections to the personal data we store about you. You may also request the deletion of personal data about you or object to its processing. In limited circumstances, you may have data portability rights



in relation to certain personal data we hold about you. These rights are not unlimited and the exercise of these rights, and the limits upon them, are briefly set out **in the table below.**

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we need to rely on – in which case, we will let

you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

### Your rights in relation to personal data

Your right	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a “data subject access request”).	<p>If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.</p> <p>We must be able to verify your identity. We may refuse a data subject access request depending on the circumstances of the request.</p> <p>We may charge an administrative fee to you where the data subject access request is excessive or significantly unfounded (limited to the actual cost required to provide access to the requested personal data in the required format).</p>
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	<p>If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.</p> <p>This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.</p>

<p><b>Rights in relation to inaccurate personal or incomplete data</b></p>	<p>You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal data accurate and up to date.</p> <p>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.</p>	<p>Please always check first whether there are any available profile or Club tools to correct the personal data we process about you.</p> <p>This right only applies to your own personal data. When exercising this right, please be as specific as possible.</p>
<p><b>Right to object to or restrict our data processing</b></p>	<p>Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.</p>	<p>This right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.</p>
<p><b>Right to erasure</b></p>	<p>Subject to certain conditions, you are entitled to have your personal data erased (also known as the “right to be forgotten”), e.g. where your personal data is no longer needed for the purposes it was collected for; where the relevant processing is unlawful, or there is an applicable law requiring erasure of the personal data; or where you have exercised a legitimate right to object to processing of your personal data.</p>	<p>We must be able to verify your identity.</p> <p>We may not be in a position to erase your personal data, if for example:</p> <ul style="list-style-type: none"> <li>• we need it to comply with a legal obligation;</li> <li>• we need it to exercise or defend legal claims;</li> <li>• we need it to exercise freedom of expression and information;</li> <li>• we need it to carry out a task in the “public interest”;</li> <li>• we need it to archive personal data in the public interest, or for scientific, historical, or statistical research purposes if those purposes would be seriously impaired by the erasure of the personal data; or</li> <li>• there is an absence of a right to request erasure under any law applicable to our processing of your personal data.</li> </ul>
<p><b>Right to withdrawal of consent</b></p>	<p>Where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.</p>	<p>If you withdraw your consent, this will only take effect for future processing.</p>

If you wish to exercise any of your rights please contact [reception@tentrinitysquare.com](mailto:reception@tentrinitysquare.com) in the first instance.

### **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. In the event of a material change which effects the processing of your personal data, we will contact you. We also encourage you to check this notice on a regular basis.

### **Where can you find out more?**

If you have any questions or concerns you wish to raise about our use of your personal data then please email [reception@tentrinitysquare.com](mailto:reception@tentrinitysquare.com).

We also encourage you to let us know if you have any concern about how we are processing your personal data so we can try to resolve your concerns. However, if you consider us to be in breach of our obligations under data protection laws, you are always entitled to submit a complaint with Information Commissioner's Office, which enforces data protection laws in the UK: <https://ico.org.uk/>