

Privacy Notice

Last updated April 2020

This website is owned by City Livery Club, Bell Wharf Lane, Upper Thames Street, London, EC4R 3TB and we are the "controller" as defined in the Data Protection Act 2018 ("the Act").

Important: When you submit personal data to us and/or use our website your personal data may be processed by us in the manner and for the purposes described below.

1. Scope of privacy notice

1.1 We are committed to maintaining the privacy and confidentiality of information provided by you to us. The term 'personal data' is defined in the Act.

2. Notification of changes to privacy notice

2.1 We are continually improving our methods of communication and adding new features to this website so if we change our data protection practices we will notify you on this page, so we encourage you to check this page frequently.

3. Collection of personal data including email addresses

3.1 When you apply for membership or as a member you contact us, we request or process personal information about you such as your name, postal address, email address and telephone number. We may also receive special category data if you indicate your religious or philosophical beliefs, racial or ethnic origin or health information. The information which you provide are either manually or electronically stored.

4. Use of personal data

4.1 We will use your personal data to fulfil your membership and your other instructions and requirements and we will ask only for data that is adequate, relevant and not excessive for those purposes. Where we send you information for any purpose, it may be sent by email or post. When we ask you for personal data it may be for any of the following purposes:

4.1.1 to contact you to inform you of our services, membership benefits or events;

4.1.2 to send you regular updates on issues we think will be of interest to you;

4.1.3 to send you requested information on our people and services;

5. Unsubscribe

5.1 We use your postal and email addresses to communicate events and other membership benefits with you and whilst you have the right to unsubscribe from either postal or email marketing communications, we will continue to use your contact details to send service messages and to communicate membership news and benefits.

5.2 You may unsubscribe from either postal or email non-membership marketing communications by emailing clerk@cityliveryclub.com or writing to The Clerk, City Livery Club, Bell Wharf Lane, Upper Thames Street, London, EC4R 3TB and include "unsubscribe from marketing" in the subject heading.

6. Anonymous data collected through this website

6.1 In addition to the information we collect as described above, we use technology to collect anonymous information about the use of our website. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which

web browsers they use. This technology does not personally identify you - it simply enables us to compile statistics about our visitors and their use of our website.

- 6.2 Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. Again this technology does not identify you personally – it simply enables us to compile statistics about the use of these hyperlinks.

7. Cookies

- 7.1 In order to collect the anonymous data described in the preceding paragraph, we may use session 'cookies' that remain in the cookies file of your browser until the browser is closed.
- 7.2 Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. For more information about cookies, including how to set your browser to reject them, please go to www.allaboutcookies.org.
- 7.3 We may also use your IP address to help diagnose problems with our server and to administer our website. An IP address is an assigned number, similar to a telephone number, which identifies your computer on a network. Your IP address is also used to gather broad demographic information.
- 7.4 We may also perform IP lookups to determine the domain you are coming from (e.g. aol.com, yourcompany.com) to gauge more accurately our users' demographics.

8. Disclosure of your personal data

- 8.1 We do not share, sell or distribute your personal data with unrelated third parties, except as otherwise provided for in this privacy notice and under these limited circumstances:
- 8.1.1 In order to provide you with the information or services which you have requested, personal data may occasionally be transferred or shared with third parties, who act for or with us, for further processing in accordance with the purposes for which the data was originally collected or for purposes to which you have consented.
- 8.1.2 We may share, transfer or disclose the information in our databases and server logs to comply with a legal requirement, to protect your vital interests, to protect the security or integrity of our databases or this website, to take precautions against legal liability, or in the event of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event.
- 8.1.3 Where appropriate, before disclosing personal data to a third party, we contractually require the third party to take adequate precautions to protect that personal data and to comply with applicable law.

9. Our lawful ground for processing your Personal Data

- 9.1 In order to comply with applicable data privacy laws, we are required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for processing your Personal Data will typically be one of the following:
- 9.1.1 our own or our third parties' legitimate business interests (for example, in maintaining and promoting our business by providing members with feedback opportunities and marketing communications or other instances where we have carried out a legitimate interests assessment and have established an existing legitimate interest);
- 9.1.2 the performance of a contract that we have in place with you as a member or otherwise;

- 9.1.3 your consent where appropriate;
- 9.1.4 to protect your vital interests; or
- 9.1.5 compliance with our legal obligations.

10. Records retention

We will keep your personal data throughout the period of your membership and thereafter, in the case of resignation for up to six months or the end of the subscription year whichever is the longer, in the case of exclusion from membership for eight years and in the case of death, indefinitely for archival purposes, or as otherwise prescribed by law, for the purposes set out above, and so this period will vary depending on your interactions with us. For example, where you have paid to attend an event with us, we will keep a record of your payment for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint about an event) for as long as is necessary to protect us from a legal claim..

11. Data subject rights

11.1 Data subjects in the EEA and other jurisdictions may have rights in relation to their personal data which include:

11.1.1 **Right to rectification.** Data subjects may request that we rectify any inaccurate or incomplete personal data.

11.1.2 **Right to withdraw consent.** Data subjects may at any time withdraw their consent to the processing of their personal data carried out by us on the basis of their previous consent. Such withdrawal will not affect the lawfulness of processing based on such previous consent.

11.1.3 **Right to make a subject access request (SAR).** Data subjects may request in writing copies of their personal data. However, compliance with such requests is subject to certain limitations and exemptions and the rights of other individuals. Each request should make clear that a SAR is being made. You may also be required to submit a proof of your identity and any payment permitted by law, where applicable.

11.1.4 **Right to object to processing including automated processing and profiling.** We do not make automated decisions about data subjects. Profiling may be carried out for business administration purposes, such as monitoring trends in user visits of our website and in order to deliver relevant ads to users' devices. We will comply with valid objection requests unless we have a compelling overriding legitimate ground for the continuation of our processing or we have another lawful reason to refuse such request. We will comply with each valid opt-out request in relation to marketing communications.

11.1.5 **Right to erasure.** Data subjects may request that we erase their personal data. We will comply, unless there is a lawful reason for not doing so. For example, there may be an overriding legitimate ground for keeping the personal data, such as, our business record retention obligations that we have to comply with.

11.1.6 **Restriction.** Data subjects may request that we restrict our processing of their personal data in various circumstances. We will comply, unless there is a lawful reason for not doing so, such as, a legal obligation to continue processing your personal data in a certain way.

11.1.7 **Right to data portability.** In certain circumstances, data subjects may request the controller to provide a copy of their personal data in a structured, commonly used and machine-readable format and have it transferred to another provider of the same or similar services. We do not consider that this right applies to our Services. However, to the extent it does, we will comply with such transfer request. Please note that a transfer

to another provider does not imply erasure of the data subject's personal data which may still be retained for legitimate and lawful purposes.

11.1.8 **Right to lodge a complaint with the supervisory authority.** We suggest that data subjects contact us about any questions or complaints in relation to how we process their personal data. However, each data subject has the right to contact the relevant supervisory authority directly.

12. Links to other websites

12.1 This website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. We do not control these websites and are not responsible for their personal data practices. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal data about yourself.

13. Governing Law

13.1 This privacy notice forms part of our website Terms of Use

14. Feedback

14.1 We welcome comments about this privacy notice. If you have any questions about this notice or any part of our service, you may contact us by emailing clerk@cityliveryclub.com or writing to The Clerk, City Livery Club, Bell Wharf Lane, Upper Thames Street, London, EC4R 3TB

approved by Council 22-04-2020