

PRIVACY POLICY

1. WHO ARE WE?

Home House Collection Limited is a company registered in England & Wales under company number 05260690 and our registered address is Cedar House, Hazell Drive, Newport, NP10 8FY).

Home House Collection Limited is the holding company for two trading subsidiaries:

Home House Limited (CRN 03054972) which trades as “Home House”;
Home Grown Club Limited (CRN 08254409) which trades as “Home Grown”.

Although the two businesses are separate and have different memberships which enjoy different services this policy caters for both. Each company has separate ICO registrations and are independent “data controllers”. The processing of personal data by both companies is similar so the policy covers both companies. There are also a number of people who hold memberships with both clubs. The two clubs share resources.

In this privacy policy we refer to “Home House” or “we” or “us” as a generic reference to either Home House or Home Grown.

2. WHAT IS THIS PRIVACY POLICY IS FOR?

This Privacy Policy gives you information about how personal data and other private information that Home House collect from you as a user of either company’s websites or as a membership applicant, member or customer (“you” or “your” being interpreted accordingly) will be used by us. When we refer to ‘personal data’ in this Policy it means any information that relates to you from which you can be identified.

By using any of our websites or submitting your personal data you are taken to accept the terms of this Policy, so please read it carefully.

For marketing purposes limited data about you may be shared between Home House Collection Limited, Home House Limited and Home Grown Club Limited.

We do not use your data for automated decision making (commonly known as profiling) and we do not send your data outside of the UK or EU.

3. WHAT PERSONAL DATA MAY WE COLLECT?

We may collect the following personal data about you:

- Any information your browser makes available whenever you visit our website. This includes your Internet Protocol address, browser type, browser language, the date and time of your query and one or more cookies that may uniquely identify your browser.

- The personal details you provide (such as name, address, e-mail address; business address and phone number) when submitting a membership application or enquiring about an event or bedroom.
- Information about your debit/credit card and bank account information that we require for the purpose of recording and processing your membership application (and administering your membership). We may also collect debit/credit card and bank account information when you purchase other services from us. For further details please also refer to the section below headed PAYMENT INFORMATION.
- Personal details you choose to give when corresponding with us by phone, e-mail or that you provide to us when you visit one of our clubs or other premises.
- We may also receive other personal or private information about you that you choose to submit to this website or any other websites that we operate.

In addition, we may collect the following “special category” data from you:

- Should you use our facilities you may disclose personal data pertaining to your fitness or medical conditions;
- Dietary requirements;
- If you require assistance in order to use our facilities.
- We operate surveillance cameras around the clubs and we will record images of you using our facilities.
- All prospective members submit a photograph as part of their application.

4. THIRD PARTIES

If a third party arranges an event which we host then that third party will disclose to us details of who is attending.

We transfer data to third parties who are our service providers. to permit selected third-party service providers to provide you with information about goods or services we feel may interest you as a member or membership applicant.

We make all necessary checks before we work with these service providers and at all time retain control of the data.

5. COOKIES

Our websites use cookies to distinguish you from other users. This is to provide you with a good user experience when you browse our website and allows us to improve its features.

Most websites you visit will use cookies to improve your user experience by enabling that website to ‘remember’ you, either for the duration of your visit (using a ‘session cookie’) or for repeat visits (using a ‘persistent cookie’). Cookies make the interaction between you and the website faster and easier. If a website doesn’t use cookies, it will think you are a new visitor every time you move to a new page on the website– for example, when you enter your login details and move to another page, it won’t recognise you and it won’t be able to keep you logged in.

Cookies may be set by the website you are visiting (‘first party cookies’) or they may be set by other websites who run content on the page you are viewing (‘third party cookies’).

If you wish to restrict or block web browser cookies which are set on your device then you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit www.aboutcookies.org, which contains comprehensive information on how to do this on a wide variety of desktop browsers.

The sort of cookies we use may include:

- Session cookies
- Google Analytics

6. HOW WE USE YOUR DATA

Home House can only process your data if it has a lawful basis for doing so:

The Club Rules set out the contract between Home Grown or Home House and the members. Personal data is processed to meet those contractual obligations; namely to provide you with membership services and administer your membership account.

For prospective members we process their data in order to assess their suitability or membership. The lawful basis is that it is a legitimate interest (see below) for us to process this data which has been voluntarily given to us for this purpose. This includes to acknowledge, confirm and deal with your membership application (and where necessary put you on our waiting list).

We retain the data disclosed to us by former members and prospective members as it is in our legitimate interest to process this data. This may be to conduct surveys or to help us investigate an incident.

All other processing of data is to meet legitimate interests. We will use personal information for relevant purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. The law calls this the “Legitimate Interests” condition for processing. Where we rely on legitimate interests, the benefits being pursued are:

- to deal with any enquiries or complaints you make;
- where you receive personal training services, limited health and lifestyle information is obtained to enable us to manage your personal training needs;
- If you are an existing member or customer of ours, we will only contact you by electronic means (such as e-mail or SMS) with information about goods and services that are like those which you previously purchased from us (or tried to purchase);
- to contact you in connection with user/customer/member surveys and use any information you choose to submit in response to administer our websites and use information to better understand users’ behaviour and to further improve our offerings and to ensure that they are presented in the most effective manner for you and for your computer/device;
- for internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our website secure;

- for enhancing customer service, processing financial information, monitoring customer usage and behaviour, recording transactions, registering for events and booking our facilities;
- to improve the level of service we provide to you through the combination of personal data that you provide to us with other information we collect about you for the purposes set out in this Privacy Policy;
- to improve data accuracy and completeness - when you register for our services you may supply us with additional information about yourself which we will use to improve our data accuracy and completeness;
- to ensure network and account security;
- email tracking – in order to improve our communications with you.

We will also process data to meet legal obligations such as helping to prevent and detect crime whether this is investigating incidents that may occur on our premises or fraud or money laundering.

You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

7. DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal requirements. To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We confirm our retention policies as follows:

1. Data pertaining to prospective members is held for up to three months;
2. Credit or debit card details for as long as the membership is current;
3. Application data pertaining to members is retained for up to seven years;
4. Data pertaining to CCTV is retained for 31 days or 3 years if the footage covers an incident;
5. Financial data is held for seven years.

8. DISCLOSURE OF YOUR INFORMATION

We may share your personal data with third parties in the following situations:

- we may make your personal data available to selected third parties who act on our behalf to support our operations for example, card processing or payment services (see the section below headed PAYMENT INFORMATION) and credit reference agencies to protect against possible fraud;
- our IT suppliers and contractors (e.g. data hosting providers or delivery partners) may need to have access to your personal information to provide IT support and enable us to

provide membership services and other goods/services available on this Website or to members and other customers;

- if we sell our business or our company assets are acquired by a third party, personal data held by us about our members or customers may be one of the transferred assets;
- if we need to disclose your personal data to comply with a legal obligation or to enforce our General Terms & Conditions, membership rules or other applicable contractual terms that you are subject to;
- to protect us, our members or contractors against loss or damage. This may include (without limit) exchanging information with the police, courts or other law enforcement organisations. Owing to our licensing requirements the police will infrequently view CCTV footage of members on the premises.

9. PAYMENT INFORMATION

Any credit/debit card payments and other payments you make through this website will be processed by our third-party payment providers and the payment data you submit will be securely stored and encrypted by our payment service providers using up to date industry standards. Please note that we do not ourselves directly process or store the debit/credit card data that you submit.

We may arrange that card or payment data you submit in support of a membership application or subscription is stored for the purpose of processing your application, initiating your membership and collecting your subscription fees if your initial application is successful (or if you are put on to a membership waiting list, please note that this data may be stored for later use to initiate your membership and subscription).

We may also store and use this card or payment information for the purpose of processing any future payments that you make as a member or customer for other goods and services. We will store this data in accordance with our legal obligations under applicable law and only for so long as legally permitted.

You may choose to opt-out of us holding your card or payment data although this means that you will need to re-supply us with card/payment details to initiate your membership subscription or for the purpose of making any future purchases.

10. SECURITY

Where we have given you (or where you have chosen) a password or log-in which enables you to access certain restricted parts of our website, you are responsible for doing everything you reasonably can to keep these details secret. You must not to share your password or log-in details with anyone else.

Unfortunately, the transmission of information over the internet or public communications networks can never be completely secure. We will take appropriate technical and organisational security measures to protect the personal data that you submit to us against

unauthorised/unlawful access or loss, destruction or damage, although we cannot 100% guarantee the security of data that you provide to us online.

11. YOUR DATA PROTECTION RIGHTS

Subject to applicable law, you may have the following rights in relation to your personal data:

- The right to request access to, or copies of, your personal data that we process. We reserve the right to request proof of identification and in certain occasions (such as redacting CCTV footage) a reasonable contribution towards the administrative costs of collating the data;
- The right to request correction of any inaccuracies in your personal data or to have data erased;
- The right to object, on legitimate grounds, to the processing of your personal data;
- The right to ask us not to process your personal data either for marketing purposes or where the processing of your personal data is causing unwarranted damage or distress;
- The right to data portability;

If you wish to exercise any of these rights please contact us as described in the CONTACT section below. Any access request may be subject to a small fee to meet our costs. We may also need to ask you for further information to verify your identity before we can respond to any request.

12. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or modifications.

13. CONTACT

Questions, comments or requests regarding this Privacy Policy should be addressed to dp@homehousecollection.co.uk or, by post, to our privacy officer at the following address: Home House, 20 Portman Square, London W1H 6LW.