

NUMBER 63 (SOROPTIMIST) LTD ('NUMBER 63') PRIVACY NOTICE

WHAT'S INCLUDED IN THIS PRIVACY NOTICE?

Number 63 is a bed and breakfast hotel with meeting rooms. You can find out more information about us **here** www.number63.co.uk.

This document (our "privacy notice") sets out information relating to how we use personal information relating to individuals we have dealings with, including guests, clients using our facilities and other third parties. It also sets out information about what rights individuals have in relation to their personal information and various other matters required under data protection law.

In particular, this privacy notice provides information to individuals about how they can object to our use of their personal information, how they can withdraw any permissions they have given to us to enable us to process their personal information and how they can make a complaint.

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WHO DOES THIS PRIVACY NOTICE APPLY TO?

This privacy notice applies to:

- our guests and individuals who use our meeting/function rooms & facilities;
- individuals who use our website;
- individuals who subscribe to our newsletters or updates;
- individuals who access our premises or the surrounding areas and who may be recorded on our CCTV system;
- individuals who participate in one of our surveys or questionnaires;
- individuals who participate in our competitions or promotions;
- individuals who engage with us on social media;

In the sections below, when referring to the individuals listed above, we use the terms “you” or “your”.

WHAT'S OUR APPROACH TO PRIVACY?

We take your privacy very seriously and want you to feel confident that your personal information is safe in our hands.

We will only use your personal information in accordance with data protection law applicable to England and Wales from time to time.

Under data protection law, when we use your personal information, we will be acting as a data controller. Essentially, this means that we will be making decisions about how we want to use your personal information and why.

Below, we summarise the main rules that apply to us under data protection law when we use your personal information:

	<p>We must be upfront about how we intend to use your personal information and must use your personal information fairly. Providing privacy information to individuals (such as in this privacy notice) is one aspect of using personal information fairly.</p>
	<p>We must only use your personal information if we have a legal basis to do so under data protection law. These legal bases include:</p> <ul style="list-style-type: none">• That you have consented to our use of your personal information;• That we need to use your personal information to perform a contract between us (or to take steps at your request prior to entering into a contract);• That we (or someone else) has a legitimate reason for needing to use your personal information and those legitimate interests are not outweighed by your rights or interests. We must balance our respective rights and interests before we can rely upon this legal basis; and• We need to use your personal information to comply with laws we are subject to.
	<p>We must only use certain types of sensitive personal information (such as information relating to your health, for example if you have a disability) if we can also satisfy one of the conditions for processing this type of information set out in data protection law. These conditions include that you have given us your explicit consent to use the information.</p>
	<p>We are only permitted to share your personal information with others in certain circumstances and if we take steps to ensure that your personal information will be secure.</p>
	<p>Generally speaking, we must only use your personal information for the specific purposes we have told you about. If we want to use your personal information for other purposes, we need to contact you again to tell you about this.</p>
	<p>We must not hold more personal information than we need for the purposes we have told you about and must not retain your personal information for longer than is necessary for those purposes (this is known as the "retention period"). We must also dispose of any information that we no longer need securely.</p>

	We must ensure that we have appropriate security measures in place to protect your personal information.
	We must act in accordance with your rights under data protection law.
	We must not transfer your personal information outside the European Economic Area (“EEA”) unless certain safeguards are in place. One such safeguard is that [the personal data is only transferred to a country that has been approved by the European Commission as having an acceptable level of data protection law.

HOW WILL WE USE YOUR PERSONAL INFORMATION?

How we will use your personal information, the legal bases we will rely upon, how long we will keep your personal information and other details will depend upon who you are and why we need your personal information in the first place.

In this section, we provide specific privacy information relating to the different categories of individuals that this privacy notice applies to.

OUR GUESTS AND INDIVIDUALS WHO USE OUR MEETING/FUNCTION ROOMS & FACILITIES

What personal information we will use	<ul style="list-style-type: none">• Your name;• Your address;• Your email address;• Your telephone number;• Bank or credit card details;• Details of any complaints;• Information about dietary requirements;• Information about any disability you tell us about
How we will obtain the personal information	<ul style="list-style-type: none">• Provided by you when booking a room with us.
What purposes we will use the personal information for	<ul style="list-style-type: none">• We will use your name, address and other contact details to supply goods and/or services to you and to communicate with you about such supply. We will also use this information to deal with any complaints that you make and to notify you of future offers;• We will use your bank or credit card details to take payment for goods and/or services;• Other than your bank or credit card details, we will keep a record of the information listed above for our internal administrative purposes;

<p>The legal bases for processing we rely upon</p>	<ul style="list-style-type: none"> • Our use of your personal information in connection with the supply of goods or services to you, taking payment and dealing with any complaints is necessary for the performance of the contract between us; • Our use of your personal information for our internal administrative purposes is based on our legitimate interests in ensuring that our business is run properly and efficiently; • Our use of your personal information for direct marketing purposes is based on our legitimate interest in promoting our business; • Our use of your personal information regarding any disability you have is based upon you giving your explicit consent for us to process that information.
<p>How long we retain the personal information and why</p>	<ul style="list-style-type: none"> • We only use your bank or credit card details for the purposes of taking payment. We do not store such information; • We will retain your name, address and other contact details indefinitely unless you ask us not to.
<p>Consequences of not providing/permitting us to obtain personal information</p>	<ul style="list-style-type: none"> • Without your name, contact details and payment information we will be unable to supply goods or services to you;

INDIVIDUALS WHO CONTACT US WITH ENQUIRIES

<p>What personal information we will use</p>	<ul style="list-style-type: none"> • Your name; • Your contact details (such as your telephone number or email address); • Details of your enquiry.
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How we will obtain the personal information	<ul style="list-style-type: none"> • Provided by you when you contact us (e.g. by making a phone call or emailing us) or make an enquiry at our premises.
What purposes we will use the personal information for	<ul style="list-style-type: none"> • We will use the personal information to deal with your enquiry; • We will also make a record of your enquiry for internal administrative purposes.
The legal bases we rely upon	<ul style="list-style-type: none"> • Our use of your personal information to dealing with your enquiry is based on your implied consent and our legitimate interests in ensuring our business is run efficiently and effectively; • Our use of your personal information for record keeping purposes is based on our legitimate interests in ensuring our business is run efficiently and effectively.
How long we retain the personal information and why	<ul style="list-style-type: none"> • Records of emails are retained in accordance with our retention policy which is available here

INDIVIDUALS WHO USE OUR WEBSITE

<p>What personal information we will use</p>	<ul style="list-style-type: none">• When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.• An anonymized string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: https://automattic.com/privacy/. After approval of your comment, your profile picture is visible to the public in the context of your comment.• If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.
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<p>How we will obtain the personal information</p>	<ul style="list-style-type: none"> • Some of the information is obtained by us automatically whenever you use our website as outline above; • Some articles on our website may include embedded content (e.g. videos images, articles, etc.) that have been collected by other websites. • Some of the information is collected by us each time you use our website through our use of cookies. Further information about the cookies we use and the purposes for which we use them can be found in our Cookies Policy number63.co.uk/privacy-policy If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year. If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser. <p>When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select “Remember Me”, your login will persist for two weeks. If you log out of your account, the login cookies will be removed.</p> <p>If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.</p>
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<p>What purposes we will use the personal information for</p>	<ul style="list-style-type: none"> • The above information is used by us to: <ul style="list-style-type: none"> • make a tailored website available to you; • track usage of our website; • help us to continually improve our website. • Information collected through our use of cookies is used in the ways described in our Cookies Policy.
<p>The legal grounds we rely upon</p>	<ul style="list-style-type: none"> • Our collection and use of the above information is based on our legitimate interests in ensuring that our website is user-friendly and appeals to our customers.
<p>How long we retain the personal information and why</p>	<ul style="list-style-type: none"> • If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue. • For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.
<p>Consequences of not providing/permitting us to obtain personal information</p>	<ul style="list-style-type: none"> • If you disable our Cookies, you will be unable to use certain parts of/functions on our website. Further information about this can be found in our Cookies Policy.

INDIVIDUALS WHO SUBSCRIBE TO OUR NEWSLETTERS OR UPDATES

What personal information we will use	<ul style="list-style-type: none">• Your name and address;• Your email address; and• Your delivery preferences.
How we will obtain the personal information	<ul style="list-style-type: none">• Provided by you when you make a booking or subscribe to our newsletters or updates.
What purposes we will use the personal information for	<ul style="list-style-type: none">• To provide you with the newsletters or updates you have requested;• To provide you with related information that we think may be of interest to you.
The legal grounds we rely upon	<ul style="list-style-type: none">• We will rely on your consent to provide you with the newsletters or updates you have requested and retain your details on our marketing database;• We will rely on our legitimate interest in promoting our products and services to provide you with other information that may be of interest to you.
How long we retain the personal information and why	<ul style="list-style-type: none">• We will retain your name, address and other contact details indefinitely unless you ask us not to.
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none">• Without your contact details, we will not be able to provide you with newsletters and updates;• You can opt-out of receiving related information at the time you subscribe to our newsletters and updates and each subsequent time we contact you.

INDIVIDUALS WHO PARTICIPATE IN ONE OF OUR SURVEYS OR QUESTIONNAIRES

<p>What personal information I will use</p>	<ul style="list-style-type: none"> • Your name; • Your address; • Your contact details (email address, telephone number etc); • Your opinions or other personal information provided by you in the survey or questionnaire.
<p>How we will obtain the personal information</p>	<ul style="list-style-type: none"> • Provided by you when you complete the survey or questionnaire.
<p>What purposes we will use the personal information for</p>	<ul style="list-style-type: none"> • To obtain information relevant to inform, appraise and improve our services.
<p>The legal grounds we rely upon</p>	<ul style="list-style-type: none"> • We will rely on our legitimate interest appraising and developing our services.
<p>How long we retain the personal information</p>	<ul style="list-style-type: none"> • We will retain your name, address and other contact details indefinitely unless you ask us not to.

INDIVIDUALS WHO PARTICIPATE IN OUR COMPETITIONS OR PROMOTIONS

<p>When you register to take part in a competition or promotion you will be required to provide the following personal information to us:</p>	<ul style="list-style-type: none"> • Your name, address and contact details; • [Your gender];
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • We will use the personal information you provide to us to register you for the competition and for general competition administration purposes.
<p>Our use of your personal information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • Where the competition or promotion is governed by rules and terms, use of your personal information will be that it is necessary for the performance of the contract between us, In all other circumstances our legal basis for using your personal information will be legitimate interests. Namely, to facilitate your participation in such competitions or promotions.
<p>We will retain your information for the following period(s):</p>	<ul style="list-style-type: none"> • We will retain your name, address and other contact details indefinitely unless you ask us not to.
<p>Can you refuse to provide your personal information to us and if so what will the consequences be?</p>	<ul style="list-style-type: none"> • Yes you can, but if you do so we will be unable to register you for the competition or promotion.

ENGAGING WITH US ON SOCIAL MEDIA

Any social media posts or comments you send to us will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they're written and could be made public. Other people, not us, control these platforms. We are not responsible for this kind of sharing. So, before you make any remarks or observations about anything, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you'll understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you're unhappy about it.

WHEN WILL WE USE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

In addition to data protection law, if we use your personal information for direct marketing purposes, we may also be subject to additional rules that regulate direct marketing. The term “direct marketing” essentially means directing marketing material or advertising at a particular individual.

To ensure compliance with both data protection laws and the specific rules relating to direct marketing, we will only use your personal information to tell you about our latest offers or to inform you of products and services which we think may be of interest to you in the circumstances outlined below:

Direct marketing by email, text or other forms of electronic communication	<ul style="list-style-type: none">• We will only contact you in this way if:<ul style="list-style-type: none">• you have given us your express consent to do so; or• you are an existing guest or customer and we want to tell you about similar products or services that may be of interest to you and you have not opted out of receiving such communications.
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Our legal bases for such processing under data protection law will either be your consent or reliance upon our legitimate interests in developing our business.

We will retain your personal information unless and until you inform us that you no longer wish to receive direct marketing information from us. You can ask us to stop sending direct marketing to you at any time by contacting us using the details set out **here** info@number63.co.uk.

WHEN WILL WE SHARE YOUR PERSONAL INFORMATION WITH OTHERS?

Sometimes, we will need to share your personal information with others. This section sets out details of who we will share your personal information with and why. It also tells you about our legal basis for doing so under data protection law and steps we will take to protect your personal information.

We will never sell your personal information on to third parties.

OUR SERVICE PARTNERS

Who are our service partners?	<ul style="list-style-type: none">We haven't included the names of our service partners in this privacy notice because their identity will change from time to time. However, if you would like further information about any of our current service providers, [please contact us using the details set out here info@number63.co.uk.
Why we need to share your personal information with them	<ul style="list-style-type: none">We use the service partners described above to enable us to perform our contracts with you.
The legal bases we rely upon when sharing your personal information	<ul style="list-style-type: none">The sharing of your personal data with suppliers and sub-contractors is necessary for the performance of our contract with you.
What precautions do we take?	<ul style="list-style-type: none">We enter into contracts with our service providers which require them to put appropriate security measures in place and which restrict their use of your personal information.

PROVIDERS OF INFORMATION TECHNOLOGY SERVICES

<p>Who will we be sharing your personal information with?</p>	<ul style="list-style-type: none"> • Suppliers of information technology products and services such as: <ul style="list-style-type: none"> • Booking systems, cloud storage provider, email system, website host (e.g. Office 365?) • We haven't included the names of our IT providers in this privacy notice because their identity will change from time to time. However, if you would like further information about any of our current IT providers, please contact us using the details set out here info@number63.co.uk.
<p>Why we need to share your personal information with such providers</p>	<ul style="list-style-type: none"> • We use suppliers of information technology products and services in connection with the supply, maintenance and/or improvement of our IT network and the creation, development hosting and maintenance of our website.
<p>The legal bases we rely upon when sharing your personal information</p>	<ul style="list-style-type: none"> • We rely upon our legitimate interests in ensuring that our business can function properly and efficiently and that our IT network is secure.
<p>What precautions do we take?</p>	<ul style="list-style-type: none"> • We enter into contracts with our IT providers which require them to put appropriate security measures in place and which restrict their use of your personal information.

OTHER THIRD PARTIES

We may also need to share your personal information with others in the following circumstances:

<p>If we sell, transfer or merge parts of our business or our assets</p>	<p>As we continue to develop our business we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. During any such process, we may need to disclose your personal information to other parties (such as potential purchasers or investors). Where we do so, we will be relying upon our legitimate business interests.</p> <p>However, we will only share your personal information in this way if the third parties in question agree to keep your personal information safe and private.</p> <p>Also, if, for example, a merger happens, the purchaser will only be able to use your personal information in the ways set out in this privacy notice.</p>
<p>Legal or regulatory requirements</p>	<p>On occasion, we may be required to disclose your personal information to organisations such as the courts or the police to comply with legal obligations we are subject to and/or to prevent fraud or crime.</p>
<p>Protecting our business</p>	<p>From time to time we may need to disclose your personal information in connection with steps we need to take to protect our business interests or property. For example, if you default with payment, we may disclose your personal information to credit reference agencies or debt collection or tracing agents.</p>
<p>Professional advice and legal action</p>	<p>We may need to disclose your personal information to our professional advisers (for example, our lawyers and accountants) in connection with the provision by them of professional advice and/or the establishment or defence of legal claims.</p>

CIRCUMSTANCES IN WHICH WE WILL SEND YOUR PERSONAL INFORMATION OUTSIDE THE EEA

We do not transfer your personal data outside the EEA.

HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

We take various steps to protect your personal information while it is in our possession, including:

- Implementation of appropriate security measures to protect our IT infrastructure;
- Storing information on a secure electronic system;
- Implementation of internal data security policies and training for members of staff in relation to such policies;
- Regular reviews of data security measures implemented by service providers who may handle your personal data;

You can help us to protect your personal information by ensuring that you do not confirm your bank or credit card details in an email. We will not ask for such personal information in this way, so any email claiming to be from us that does so is likely to be fake. Please ignore it.

WHAT RIGHTS DO YOU HAVE UNDER DATA PROTECTION LAW?

Under data protection law, you have a number of different rights relating to the use of your personal information. The table below contains a summary of those rights and our obligations. More information about your rights and our obligations can be found on the ICO website <https://ico.org.uk/>.

Your rights	What this involves	What our obligations are
A right of access	This is a right to obtain access to your personal data and various supplementary information.	<ul style="list-style-type: none"> We must provide you with a copy of your personal information and the other supplementary information without undue delay and in any event within 1 month of receipt of your request; We cannot charge you for doing so save in specific circumstances (such as where you request further copies of your personal information).
A right to have personal data rectified	<ul style="list-style-type: none"> This is a right to have your personal information rectified if it is inaccurate or incomplete. 	<ul style="list-style-type: none"> We must rectify any inaccurate or incomplete information without undue delay and in any event within 1 month of receipt of your request; If we have disclosed your personal information to others, we must (subject to certain exceptions) contact the recipients to inform them, that your personal information requires rectification.

<p>A right to erasure</p>	<ul style="list-style-type: none"> • This is a right to have your personal information deleted or removed. • This right only applies in certain circumstances (such as where we no longer need the personal information for the purposes for which it was collected). • We have the right to refuse to delete or remove your personal data in certain circumstances. 	<ul style="list-style-type: none"> • If this right applies, we must delete or remove your personal information without undue delay and in any event within 1 month of receipt of your request; • If we have disclosed your personal information to others, we must (subject to certain exceptions) contact the recipients to inform them that your personal information must be erased.
<p>A right to data portability</p>	<ul style="list-style-type: none"> • This is a right to obtain and re-use your personal information for your own purposes; • It includes a right to ask that your personal information is transferred to another organisation (where technically feasible). • This right only applies in certain limited circumstances. 	<ul style="list-style-type: none"> • If this right applies we must provide your personal information to you in a structured, commonly used and machine readable form • Again, we must act without undue delay and in any event within 1 month of receipt of your request; • We cannot charge you for this service.

<p>A right to object</p>	<ul style="list-style-type: none"> • This is a right to object to the use of your personal information. • The right applies in certain specific circumstances only. • You can use this right to challenge our use of your personal information based on our legitimate interests; • You can also use this right to object to use of your personal information for direct marketing 	<ul style="list-style-type: none"> • If you object to us using your personal information for direct marketing, we must stop using your personal information in this way as soon as we receive your request. • If you object to other uses of your personal information, whether we have to stop using your personal information will depend on the particular circumstances.
<p>A right to restrict processing</p>	<ul style="list-style-type: none"> • This is a right to 'block' or suppress processing of your personal information. • This right applies in various circumstances, including where you contest the accuracy of your information). 	<ul style="list-style-type: none"> • If we are required to restrict our processing of your personal information we will be able to store it but not otherwise use it. • We may only retain enough information about you to ensure that the restriction is respected in future. • If we have disclosed your personal information to others, we must (subject to certain exceptions) contact them to tell them about the restriction on use.

If you wish to exercise any of your rights, you can make a request by contacting us using the details set out **here** info@number63.co.uk.

If you request the exercise of any of your rights we are entitled to ask you to provide us with any information that may be necessary to confirm your identity.

YOUR RIGHT TO WITHDRAW CONSENT

If you have given us your consent to use any of your personal information, you can withdraw your consent at any time. To do so, please contact us using the details set out **here** info@number63.co.uk.

HOW CAN YOU GET IN TOUCH WITH US?

You can get in touch with us in the following ways:

Postal address	Number 63 (Sorooptimist) Ltd, 63 Bayswater Road, London W2 3PH
Email address	info@number63.co.uk
Phone number	+44 (0)20 7723 8575

RIGHT TO COMPLAIN TO THE INFORMATION COMMISSIONER'S OFFICER

If we are unable to deal with a complaint to your satisfaction or if you are unhappy with the way we are using your personal data, you also have the right to make a complaint at any time to the UK's supervisory authority for data protection issues, the Information Commissioner's Office.

CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice from time to time. If we make any substantial updates, we will provide you with a new privacy notice. We may also notify you in other ways from time to time about the processing of your personal information.