

## PRIVACY POLICY

London Bees respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

London Bees is the controller and responsible for your personal data (collectively referred to as the **Club, we, us** or our in this privacy notice).

If we make any changes to this privacy notice we will endeavour to alert you of such. Please keep us informed if your personal data changes during your relationship with us.

### 1. What information do we collect?

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Typically we will collect name, address, date of birth, contact details and, if you proceed to purchase something from us, your bank details.

### 2. How will we use your personal data?

We use information about you for the following purposes:

(A) Services, products & opportunities: to allow you to register an account or otherwise receive products, services and other opportunities (such as a membership, streaming subscription or newsletter) and fulfil any of our obligations for delivery of those. Automated processes may assess your eligibility to receive services based on the information you provide. If you think that process has incorrectly refused you a subscription, let us know why and we will review it.

This will usually be necessary: (i) to perform any contract with you for the relevant service where applicable; (ii) to comply with legal obligations where applicable, and/or (iii) otherwise for our legitimate interests in complying with third party requirements which enable us to provide the service(s).

(B) Payments and finance: to collect payments from you for any paid for products or services, and/or administer any payments which may become due to you.

This will usually be necessary: (i) to perform any contract with you for the paid for service; (ii) to comply with legal obligations where applicable, and/or (iii) for our legitimate interests in recovering debts due to us.

(C) Participation (if any): to enable you to participate in chat rooms, forums, message boards, news groups, and similar. Information you post in these areas may become public information and must always comply with Club rules, as published or notified to you from time to time.

This will usually be necessary: (i) to perform any contract with you for the relevant service, or (ii) for our legitimate interests in running and improving our services and managing our relationship with you as a customer.

(D) Publications: to include you in relevant publications (e.g. should you win a promotion that we or one of our commercial partners carry out.)

We will usually ask you for consent in these circumstances.

(E) Management and improvement: to manage and improve the services we offer; notify you of applicable changes (where required), and allow you to use the features offered.

This will usually be necessary: (i) to perform any contract with you where relevant for applicable services; (ii) to comply with legal obligations where applicable, or (iii) otherwise for our legitimate interests in managing our relationship with you as a customer, improving our service, and/or record keeping.

(F) Communication: to communicate with you (where necessary) for purposes other than marketing.

This will usually be necessary: (i) to perform any contract with you for applicable services where relevant; (ii) to comply with legal obligations where applicable, or (iii) otherwise for our legitimate interests in managing our relationship with you as a customer, improving our service, and/or record keeping.

(G) Administer and protect: to administer and protect our businesses, the services and products, and both our rights and the rights of associated third parties (including those of other users and partners). This may include routine tasks, as well as more formal matters (e.g. bringing, defending or assisting in legal action where required).

This will usually be necessary: (i) for our legitimate interests in running our business and systems in a secure manner, business restructuring, protecting our rights and property (including intellectual property) and preventing or tackling illegal activity, or (b) to comply with a legal obligation where applicable.

(H) Marketing & associated profiling: to alert you to information about events, surveys, competitions, offers, products, services and other exciting updates relating to us, and/or commercial partners. You can change your preferences here at any time either in your personal profile page or by emailing us at [tellus@thehivelondon.com](mailto:tellus@thehivelondon.com)

This will usually be carried out on the legal bases of consent and/or legitimate interest, which applies to our and/or our partners' marketing of relevant products, services and offers.

(I) Research, analysis & personalisation: to carry out market research in order that we may improve the products and services we offer, and in some circumstances personalise content. Your feedback is valued and helps to inform the commercial strategy, marketing activity and initiatives across the Club.

This will usually be necessary on the basis of legitimate interest in order to study how customers use our products/services, to develop them, to grow our business and to inform our commercial and marketing strategies.

### **3. Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

#### **4. Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of the website you visit.

#### **5. Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

If this occurs and you have any questions or concerns, please contact us at [tellus@thehivelondon.com](mailto:tellus@thehivelondon.com)

#### **6. Disclosure of your personal data**

We will not share your data with any other organisation unless legally or otherwise reasonably obliged to do so. Where there is a requirement to share your data outside of our organisation we will fully inform you of the reasons for this (where possible) and will not share unless you give us explicit consent or we are required to do so by a legal or regulatory body.

Should we wish to share data with partners for marketing purposes we will obtain your consent to do so.

#### **7. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **8. How long will we use your personal data?**

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for satisfying any legal, accounting, or reporting 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.

If you have provided us with consent, then we will continue to send you details of applicable promotional offers until you withdraw your consent, or until we deem it reasonable to do remove your details.

## **9. Your rights**

Under data protection law, you may have the following rights in relation to your personal data in certain circumstances:

Request access: You can receive a copy of the personal data we hold about you – known as a ‘data subject access request’.

Request correction: You can have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of new data you provide.

Request deletion: You can ask us to delete or remove personal data in certain circumstances. E.g. if there is no good reason for us continuing to process it; you have successfully exercised your right to object to processing, or where we may have processed your information unlawfully or are required to erase your personal data to comply with local law.

Object to processing of your personal data: This applies where we are relying on a legitimate interest or those of a third party and you feel our processing on this ground impacts your fundamental rights; or where we are processing your personal data for direct marketing purposes.

Request restriction of processing: You can ask us to suspend processing of your personal data where you want us to establish its accuracy; our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it (e.g. to establish, exercise or defend legal claims), or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer: You can ask us to provide your data to you or a third party of your choice. This right only applies to automated information that you initially consented use of or which was used in performance of a contract with you.

Right to withdraw consent: This only applies where we are relying on consent to process your personal data. Should you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **10. Changes to this policy**

We may need to update this privacy policy from time to time and minor changes will be made without notification, so you should check back on occasion. Significant changes will be notified to you.

This policy was last updated on: 16/08/2024

## **11. Who to contact?**

All requests set out in this section or other queries relating to this privacy policy should be addressed to: [tellus@thehivelondon.com](mailto:tellus@thehivelondon.com)

Please note we may not always be able to comply with your request due to our legitimate interests or other legal reasons. If applicable, these will be notified to you in response to a relevant request.

You will not usually have to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive (or we may refuse to comply with your request in these circumstances).

For security reasons, we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). We may also ask you for further information in relation to your request.

If you have any concerns about how we use your data you also have the right to raise this with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>). However, we will always try to help with any concerns so ask that you contact us in the first instance.