

Introduction

Cubitt House 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 websites, when we send you other digital or non-digital marketing communications or other digital media and also tells you about your privacy rights and how the law protects you.

You acknowledge and agree that your personal data may be processed in accordance with this policy. Without this, we will be unable to provide you with certain marketing communications.

Important Information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Cubitt House collects and processes your personal data through your use of our websites or when we send you other digital or non-digital marketing communications, including any data you may provide through our websites when you sign up to one of our newsletters, purchase a product or service or take part in a promotion or competition, as an example.

Our websites are not intended for children (under the age of 18 years) and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Cubitt House is made up of different legal entities. This privacy notice is issued on behalf of the Cubitt House Group so when we mention "Cubitt House", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Cubitt House Group responsible for processing your data. The Cubitt House Group are the controller and responsible for all websites.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us first on,

marketing@cubitthouse.co.uk.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us following the procedure on our latest communication to you or by emailing marketing@cubitthouse.co.uk

Third-party links

Our websites 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 websites/apps, we encourage you to read the privacy notice of every website you visit

The data we collect about you

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** e.g. your name, or date of birth.

- **Contact Data** e.g. your address or telephone number.
- **Financial Data** e.g. bank account details.
- **Transaction Data** e.g. other details of products and services you have purchased from us.
- **Technical Data** e.g. your login data, browser type , geo-location, IP addresses and version.
- **Profile Data** e.g. your username and password, your interests or preferences.
- **Usage Data** e.g. information about how you use our websites/apps, products and services.
- **Marketing and Communications Data** e.g. your preferences in receiving marketing from us.
- We do not collect any Special Categories of Personal Data about you. For details about this category please visit the ICO website and search for 'Special Category Data'.

We may record or monitor calls, emails, text messages and other correspondence for training purposes to improve the quality of our offering and to prevent and detect fraud.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you:

Direct interactions:

You may give us your information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our websites;
- subscribe to our service or publications;
- sign in to our Wifi platform;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions:

As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy for further details.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have specifically requested to be kept informed about our products, services and promotions etc
- Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Our latest communication to you will tell you how to unsubscribe, or you can email marketing@cubittouse.co.uk and your request will be processed.

Promotional offers from us

We may use your data 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.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you signed up to one of our newsletters, entered a competition or registered for a promotion and, in each case, 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 company outside the Cubitt House Group of companies for marketing purposes.

Opting out

Each time we send you a new marketing communications message, you will be given the opportunity to opt-out easily and securely, by confirming the preferences you would like to unsubscribe from and then clicking the one time unsubscribe button. Alternatively contact us at any time at marketing@cubittouse.co.uk we will organise the unsubscribe process on your behalf.

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 our websites may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your personal data while necessary 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. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with service providers or as required by law. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes, relating to Cubitt House and in accordance with our instructions. We may need to share your personal data with the following categories of third parties:

- Service providers and suppliers assisting with our business activities, business associates, customers, payment service providers, hosting providers, providers of IT support, advertising platforms, providers of booking systems, providers of cloud-based software or services used by us, accounting firms and law firms;
- Ombudsman, regulators, public authorities and security organisations, such as the police, HM Revenue & Customs and the Information Commissioner's Office, to the extent required by law, regulation or court order.
- Companies in the same group as us;
- Current, past and prospective employers, recruitment and employment agencies, trade and employer associations and professional bodies and educators and examining bodies;
- Financial organisations and advisors, credit reference agencies, debt collections and trading agencies, and tenants;
- Family, associates and representatives of the person whose personal data we are processing;

International Transfers

We do not transfer your personal data outside the European Economic Area (EEA).

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 team members, 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

Data Retention

How long will you use my personal data for?

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, to include the right to:

- Request access to your personal data.
- Send a copy of your personal data to another data controller.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact marketing@cubittouse.co.uk

No fee usually required

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

What we may need from you

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). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Cubitt House, 57 Gloucester House, Gloucester Place, Marylebone, London, W1U 8JH

Tel: 020 7881 9840

www.cubittouse.co.uk

Company No. 05399542 (UK)

Cookies Policy

In this cookies policy the term “cookies” is used to describe a piece of text which is placed on your device’s hard drive. Your browser will add the text in a small file. Depending on your device’s settings you may have to

give permission for it to do this, or your browser may allow it to be done automatically. You should be able to change these settings through your devices internet browser.

The cookie, if installed on the hard drive, will collect data such as web traffic or what a person does when they visit a particular site. Cookies can also allow websites to remember your preferences for future visits and gathers information about your visit.

We tend to think of our cookie use as minimal and we do not yet use cookies for marketing purposes. However we do need to use some cookies that are strictly necessary or performance related. These name and purpose of these cookies are set out below:

- Essential cookies: these are essential to provide you with the services available through our websites and to use some of their features, such as access to secure areas – without these, providing core functionality, such as secure log in accounts, would not be possible;
- Analytics cookies: for tracking anonymous site traffic statistics. Used to collect information about how you and others use our websites – the information gathered does not identify you and is aggregated – we use this information to help operate our websites efficiently, to gather broad demographic information and monitor the level of activity.
- Functionality cookies: these allow our websites to remember choices you make (such as your user name or the region you are in) and provide enhanced, more personal features – the information used these cookies collect may be anonymised and they cannot track your browsing activity on other websites.
- Performance cookies: these collect information about how you and others use our websites, for example, which pages are most visited, if error messages come up and how effective our online promotions are.
- Marketing cookies: these facilitate online advertising – our websites, for example, use remarketing with Google. Third parties use these cookies to tailor adverts based on someone's past visits and activity.
- Session cookies: which is used to keep track of a user's visit to do things like determine if a form has been submitted or show a thank you message once a form has been submitted.

Most of the cookies we use expire and delete themselves after a set period of time, however if you prefer you can delete them using your internet browser's options. We cannot use cookies to spread viruses or to gather personal information, for example email addresses. They cannot read anything stored on your hard drive and are designed solely for purpose.

Disabling cookies

It is your choice whether you allow us to use cookies or not. If you decide that you do not wish to use cookies you may disable them through your internet browser's website.

Disabling cookies will not prevent you from accessing our website but please bear in mind that if you chose to disable cookies then some of the functionality in our website may not work or display correctly.

Changes to our cookies

We may need to change the cookies we use from time to time and if we do so we will always try to update that information in this cookie policy. We will always do this should our cookie use change so that we start to collect different data or start to use cookies for marketing purposes. We recommend that you check back here regularly to ensure that you continue to agree with our use of cookies.

Version

This cookie policy is dated January 2019.