



MEMBER'S PRIVACY NOTICE

1. ABOUT THIS DOCUMENT

- 1.1. Winter Restaurants Limited (WRL) is the owner and operator of Oswald's private members' club (the Club), and is the data controller of your personal data i.e. the ultimate controller of how all personal information about you is stored, processed or transferred.
- 1.2. WRL is a limited company registered in England with number 10211487, whose registered office is at 10 Norwich Street, London, EC4A 1BD.
- 1.3. If you have any queries about this notice or issues in relation to the processing of your personal data, please contact:
Address: 6b Hertford Street, Mayfair, London W1J 7RQ
Email: p.stoop@oswaldsclub.com Contact name: Piers Stoop
- 1.4. During the course of WRL's activities it will process personal data (which may be held on paper, electronically, or otherwise) about you and it recognises the need to treat such personal data in an appropriate and lawful manner, in accordance with the Data Protection Act 1998 and, from 25 May 2018, the EU General Data Protection Regulation. The purpose of this notice is to make you aware of how WRL will handle your personal data.
- 1.5. This document applies to personal data processed in relation to:
 - 1.5. 1. Club members;
 - 1.5. 2. Applicants for Club membership; and
 - 1.5. 3. Former Club members.
- 1.6. The Club offers free Wi-Fi connection to members and guests. We do not monitor, track or store any data from any wifi users. We do restrict access to certain sites and content.

2. PERSONAL DATA

- 2.1. Personal data means recorded information WRL holds about you from which you can be identified. It may include:
 - 2.1. 1. contact details including photographs of members;
 - 2.1. 2. the names of your guests;
 - 2.1. 3. other personal information, such as details of your dietary preferences;
 - 2.1. 4. records of your attendance at the Club
 - 2.1. 5. restaurant and bar purchases;
 - 2.1. 6. financial information, such as direct debit and/or bank card details;
 - 2.1. 7. records of any instances of unreasonable behaviour on Club premises;
 - 2.1. 8. CCTV recordings monitoring the interior and entrances to the Club premises;
 - 2.1. 9. expressions of opinion about you or indications as to WRL's intentions about you.
- 2.2. WRL will not hold any special or sensitive categories of data, such as health data, or information about criminal convictions about you.



3. FAIR AND LAWFUL PROCESSING

3.1. WRL will only process your personal data for the following purposes:

- 3.1.1. in order to process your application for membership of 5HS, (or any renewal of membership) and communicate with you and your proposer in this regard;
- 3.1.2. in order to fulfil WRL's obligations to you as a member of the Club (e.g. where WRL uses your bank details to collect payment of subscription) or where you use the Club's services (such as settlement of your account for dining, wine services or with the Club);
- 3.1.3. selling tickets for events organised by the Club;
- 3.1.4. for one of WRL's legitimate interests, which include the following:
 - 3.1.4. 1. administering the Club, for the benefit of all members;
 - 3.1.4. 2. enforcing the Club Rules;
 - 3.1.4. 3. informing you about Club activities and offers;
 - 3.1.4. 4. informing you of news, promotions, offers and business activities carried on by WRL or any of its subsidiaries or affiliates;
- 3.1.5. for any purpose required by law (including the maintenance of any Incident Register required as a condition of the Club's licence).

3.2. Please note that if WRL requests details from you in connection with the purposes above and you fail to provide such information, then in some cases WRL may not be able to provide the services you require, and in some cases may be unable to progress your application for membership or have to terminate your membership of the Club.

4. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

- 4.1. The Club is affiliated with, and shares administrative and support facilities with clubs operated by 5 Hertford Street Limited. Your information held in relation to one club may be referenced or used in relation to another of such clubs of which you are also a member or which you apply to join.
- 4.2. WRL may transfer information to:
 - 4.2. 1. banks or credit card companies in order to collect sums due to it from you;
 - 4.2. 2. its other providers which it requires in order to provide the services that you require;
 - 4.2. 3. law enforcement, including local authority licensing bodies, for the purpose of complying with the club's licensing and the prevention and detection of crime.
 - 4.2. . the Membership Committee of the Club, as constituted from time to time. A list of members of the Membership Committee is available on request to the membership secretary.
- 4.3. Where concern arises for your suitability for membership or continued membership, WRL may discuss its concerns with the member who proposed your application to join the Club.
- 4.4. Except as set out above, your personal information will not be transferred to any third party.
- 4.5. Your personal information will not be transferred to any person outside the EEA, unless you ask WRL to correspond with you in a different country, or your payment method requires it to do so.



5. RETENTION OF DATA

WRL will retain your personal data whilst you are a member of the Club. After you cease to be a member, WRL will retain your information for the longer of:

- 5.1. a period of 6 years following the cessation of your membership of the Club; and/or
- 5.2. as long as is necessary for WRL to comply with any legal requirement to which it is subject.

6. MISCELLANEOUS

- 6.1. You may request access to, correction of or a copy of your information from WRL at any time. You may also ask WRL to stop using your data at any time (if certain criteria apply).
- 6.2. If the basis on which WRL has acquired your data is by your prior written consent, you may also withdraw this consent at any time.
- 6.3. If you consider WRL's use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, i.e. the Information Commissioner's Office.
For further details, please visit www.ico.org.uk.