

Privacy Notice – General

1 Who we are

The Stay Club is an associated group of companies that provide accommodation and co-working spaces. Our registered office is at c/o Hallmark Property Group, 46 Great Marlborough Street, London, W1F 7JW. You can contact us at the address above or by email at info@thestayclub.com.

These companies are data controllers and decide how your personal data is processed.

2 What this notice covers

This Privacy Notice, together with any other documents referred to in it, explains how we process your personal data, following the Data Protection Act 2018 and UK GDPR applied within.

It applies when you use our website, when you interact with us through social media, email, phone or in person and also when you participate in activities arranged by us.

With that in mind, you should consider that this Privacy Policy applies to you if you are a

- resident
- prospective resident
- guests of a resident
- prospective employee
- visitor of an employee
- business customer or client
- supplier or contractor
- prospective supplier or contractor
- website visitor

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

3 What data we process

We may ask you to provide certain data from you or collect certain data about you from third parties. If we are unable to process this data, you may not be able to use our services or receive the customer experience we aim to provide. The data we process may include

- Identity data - including first name, last name, username or similar identifiers
- Date of birth
- Photograph
- Account login details
- Contact data - including billing/delivery address, email address and telephone numbers
- Academic data - including student status and course details
- Immigration data - including immigration status and country of citizenship, copies of passports/ID card
- Social media handle and public profile picture
- Financial data - including payment card details
- Where you have booked through a third party such as an educational establishment, tour operator or agent, communications between you and us and between you and the third party
- Transaction data - including details about payments to and from you and other details of products and services you have acquired from us or us to you
- Technical data - includes internet protocol (IP) address, browser type and version, location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- Usage data - includes data about how you use our website, products and services
- Marketing and communications data - includes your preferences in receiving marketing from us and your communication preferences as well as correspondence to/from The Stay Club, including emails, webform/chats, telephone call logs and recordings
- Personal data related to individuals applying for jobs at The Stay Club
- Personal data related to educational establishments, clients, tour operators or similar
- Personal data related to suppliers/contractors
- Other data needed to provide a service to you includes
 - Health and safety data including data about incidents and accidents and data needed for personal evacuation plans
 - Welfare and behaviour data (eg data about your behaviour whilst living in our properties (such as being in debt, incidents) as well as data about your wellbeing where we are, or someone else is, concerned about you)
 - Building access data including electronic door access and lockout/temporary key logs
 - CCTV recordings of communal areas

4 Why we process data

The main reasons we use your data are

- Legitimate commercial, operational or financial interest
- To perform a contract with you
- To follow legal obligations, including health and safety
- Marketing
- Fraud prevention
- Informing you about relevant Stay Club activities
- Staff training
- Managing health, safety and welfare
- Complaint management
- To improve the services you, and other residents and clients, receive from us
- To allow us to manager our working relationships

We will only use your personal data for the purposes for which we collected it. However, we may need to use it for another reason. If that is the case and the reason is compatible with the original purpose, we will use it without contacting you but, if the purpose is different, we will let you know and will explain the legal basis which allows us to use it.

5 Our lawful bases for processing your data

We will only collect, use and share your personal data where we are satisfied that we have an appropriate legal basis to do this. This may be because

- Our use of your personal data is necessary to follow relevant legal or regulatory obligation that we have eg confirmation of student status
- Our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you eg to create an accommodation agreement etc
- Our use of your personal information is in our legitimate interest as a commercial organisation and in these cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights and you have a right to object to processing as explained in the section below
- To protect your vital interests in an emergency situation where you are unable to do so
- You have provided your consent to us using the personal information (for example, the performance of a contract or the creation of an accommodation agreement)

6 Hotel stays

We offer hotel stays at some of our properties. If you stay with us under such a booking, we ask for your name, title, nationality, Passport/ID number, place of issue and address of next destination when you check in. This information is stored for us to follow the Immigration (Hotel Records) Order 1972. If requested by the police or any person authorised by the Secretary of State, we are obliged to share your data.

7 Disclosure of your data

In order to provide our services, we may share your data with selected third parties including

- Where we have a legal or regulatory obligation to do so – this will include sharing your personal data with local authorities for the provision of Council tax exemption and the provision of electoral roll services.
- To support public health authorities, the local authorities, and educational establishments with managing public
- Business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them or you.
- Where it is necessary to do so to protect or defend our legal rights or the legal rights of others.
- With your educational establishment, tour operator, agent or similar so that they can provide you with support in the event that we have concerns surrounding your health or in the event of any serious conduct matters.
- With your emergency contact in the event this is needed.
- Analytics and search engine providers that help us in the improvement and optimisation of our site.

We may disclose your personal data to third parties

- In the event that we buy or sell any business or assets for which we are the data controller where we may be required to disclose your personal data to the prospective seller or buyer, managing agent and solicitors of such business or assets.
- If Stay Club substantially all its assets are acquired by a third party where personal data held by us about our residents will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to follow any legal obligation, or in order to enforce or apply our terms of use, or to protect the rights, property, or safety of The Stay

club, our residents, or others. This includes exchanging data with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- We may also supply aggregated statistics about our sales, residents, traffic patterns and other site data to third parties, but these statistics will not include any data that could personally identify you.

8 Disclosure of sensitive data

If we are concerned about the welfare or behaviour of a resident we may share this information with third parties wither in their vital interest, the public interest, or following other exceptions allowed under data protection law.

The third parties that we would share this information with, if we do, would usually be

- the educational establishment of a resident eg a university welfare office
- healthcare professionals such as a local authority mental healthcare team
- the emergency services

We may share this data without the consent of the individual it relates to, particularly if it would be in the vital interests of the resident or if it is in the public interest.

In highly exceptional circumstances The Stay Club may contact the next of kin (whose details will have been provided by the individual) to share welfare or behavioural information.

The Stay Club will ensure that this information only shared with third parties after careful consideration of the individual's rights. Such a decision will be made by a senior member Stay Club management.

9 Data transfer outside the EEA

We may transfer your information outside the borders of the EEA while processing it.

10 How long we keep your data

We will only keep your personal data for as long as it is necessary to fulfil the purposes, we collected it for, including complying any legal, accounting, or other reporting requirements.

To decide 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
- applicable legal requirements.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

11 Your rights

Under data protection law, subject to certain conditions, you have the following rights concerning your personal data

- The right to be informed about the processing of your personal data
- The right to access personal data held by us about you
- The right to have inaccurate personal data held by us about you rectified, or completed if incomplete

- The right to require us to erase any personal data held by us about you
- The right to restrict the processing of your personal data
- The right to require us to transfer your data to another organisation
- The right to object to the processing of personal data held by us about you
- The right to ask us not to use data about you in a way that allows computers to make decisions about you and ask us to stop.
- The right to withdraw consent, where we are relying on this to process your data
- The right to complain to the Data Commissioner's Office (ICO), the UK regulator

You can visit the ICO website for more data on these rights and what they mean to you.

If you have any complaint in relation to how we process your personal data, you are entitled to ask the Data Commissioner's Office to review the matter. Details about how to contact them are listed below.

12 How to contact us

If you have any question about this privacy notice, please email us at dataprotection@thestayclub.com write to us at Data Protection, The Stay Club, 46 Great Marlborough Street, London, W1F 7JW.

13 How to make a complaint

If you have a complaint about our use of your data, you can contact the Data Commissioner's Office via their website at www.ico.org.uk/concerns or write to them at

Data Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

14 Other websites

Our website has links to other websites. This privacy notice only applies to this website so when you proceed to other websites you should read their own privacy policies.

15 Changes to the privacy notice

We may update or amend this privacy notice. Any updates or changes will be shared on this page. For this reason, we encourage you to review this privacy notice from time to time.

This policy was last reviewed on the 10th of January 2022.