

## GENERAL PRIVACY NOTICE

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## 1. What This Is For

The Stay Club is committed to complying with UK and EU data protection legislation, including the Data Protection Act 2018 and the General Data Protection Regulation. This Notice will help you understand the different ways we use your personal information (any information which makes an individual identifiable) – what information we collect and why, where we collect it from and if (and with whom) we might share it with. It will also tell you about your rights about the information we have about you.

## 2. Who We Are

This Privacy Notice applies to The Stay Club (also referred to as 'us', 'we' and 'our') and its associated companies including

- Stay Campus Sixth Form College (operating as Stay Campus College)
- Stay Campus London Limited
- Stay Professional Limited
- The Stay Club Camden Limited
- The Stay Club Colindale Limited
- The Stay Club Kentish Town Limited
- Stay Club Willesden (also known as Nicoll Studios Ltd)

## 3. Whom This Notice Applies To

This Privacy Notice applies to

- Anyone who contacts us by any means
- Suppliers/contractors (including perspective)
- Users of The Stay Club website and its subdomains
- Anyone who provides us with unsolicited personal information

## 4. When This Notice Applies

This Notice applies to personal information collected by The Stay Club; it does not apply to any processing of personal information by third-party companies, individuals, organisations or via other websites that The Stay Club website may link to. Where third parties collect your personal information, their privacy policies will apply. We urge you to read these carefully.

Please note that although we provide internet access within our buildings, this service is provided by a third-party internet service providers, who are the data controllers of any information collected as a result of the service provision and their Privacy Notices will apply. Depending on the building, this provider is

- Cablecom Networking Limited (operating as Studentcom) of 1 Rivermead Court, Kenn Business Park, Windmill Road, Kenn, Clevedon, BS21 6FT
- Ask4 Ltd of Devonshire Green House, 14 Fitzwilliam St, Sheffield, S1 4JL, United Kingdom

## 5. Data Protection Principles

Data protection law outlines six principles for how we should process your information. These say that your information must be

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Adequate, relevant and limited to the purposes we have told you about and limited to only that purpose
- Accurate and up to date
- Kept only if necessary, for the purpose we have told you about or as long as legally required
- Stored securely

## 6. Your Rights

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

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

- The right to require us to erase any personal information held by us about you
- The right to restrict the processing of your personal information
- The right to require us to transfer your information to another organisation
- The right to object to the processing of personal information held by us about you
- The right to ask us not to use information 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 information
- The right to complain to the [Information Commissioner's Office \(ICO\)](#), the UK regulator

You can visit the [ICO](#) website for more information on these rights and what they mean to you.

## 7. What Personal Information We Process

We may process the following kinds of information about you

- Identity information - includes first name, last name, username or similar identifier
- Contact information - includes billing address, delivery address, email address and telephone numbers
- Biometric information - eg copies of passports and ID cards
- Academic information - includes student status
- Geographic information - third parties such as MailChimp, which we use for marketing communication may collect information such as your longitude and latitude. Information such as this will be covered under their privacy policies; The Stay Club will not seek to use such information for any purpose
- Immigration information - includes immigration status and country of citizenship
- Financial information - including limited payment card details
- Transaction information - includes 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 information about how you use our website, products and services
- Marketing and communications information - 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
- Other information required to provide a service to you includes
  - Health and safety information including information about incidents a accidents and information required for personal evacuation plans
  - Building access information including electronic door access and lockout/temporary key logs
  - Asset tracking information
  - Building access data including electronic door access and lockout/temporary key logs
  - CCTV recordings of communal areas

We also process information such as statistical or demographic data for any purpose. Aggregated data may be derived from your data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Notice.

Occasionally we may receive health information or other sensitive information without having asked for it eg a resident may email us a doctor's letter that we have not requested. In this situation, we will deem that the sender has provided explicit consent for us to process this information.

## 8. Why We Process Your Personal Information

Overall, we will use your personal information to manage your relationship with us. The main reasons we use your information are

- Legitimate commercial, operational or financial interest
- To perform a contract with you
- To comply with legal obligations, including health and safety
- Marketing
- Fraud prevention
- Informing you about relevant Stay Club activities
- Staff training
- Security and welfare
- Complaint management

We will only process your personal information for the purposes 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 information for a different purpose, we will notify you and explain the legal basis which allows us to do so. If required, we will seek your consent.

### 9. How Long We'll Keep Your Information

We will only retain your personal information 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 determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

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

### 10. Sharing Welfare or Behavioural Information

In exceptional circumstances, where we are concerned about the welfare or behaviour of a user of The Stay Club website or premises, we may share this information with third parties as permitted under data protection law. Where information of this nature is shared, it will usually be one of the third parties listed below

- The resident's university/educational establishment (e.g. university welfare office)
- Healthcare professionals (e.g. local authority mental healthcare team)
- Emergency services

We may also contact emergency contact persons to share welfare or behavioural information as appropriate, following careful consideration of your rights and freedoms.

### 11. Information Transfers Outside The EEA

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

### 12. Disclosing Your Information To Third Parties

We may disclose your personal information to third parties as required by law, for crime prevention and to protect your vital interest. The reasons for doing so include

- where we have a legal or regulatory obligation to do so
- where we use third party suppliers to provide services to us (for example, our IT providers) and they need access to your personal information to deliver that service
- where it is necessary to do so to protect or defend our legal rights or the legal rights of others
- if we sell our business or a property, we will transfer information relating to occupants and guarantors to the new owner
- if you have agreed that we may do so, we will share your personal information with identified third parties
- if you placed a booking through a third party such a visiting language programme

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

### 13. How To Contact Us Or Make A Complaint To The Regulator

To contact us about our Privacy Notice or information we hold about you, please write to The Stay Club's Compliance Coordinator by email ([dataprotection@thestayclub.com](mailto:dataprotection@thestayclub.com)) or by post (The Stay Club, 46 Great Marlborough Street, London, W1F 7JW). If you request access to the information we hold on you, we will act on the request within one calendar month; however, we may take longer for some requests. If this is the case, we will let you know.

If you are unhappy about how we have addressed any concerns about the way we process your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator. You can find more information about this [here](#).

#### 14. Changes To This Notice

We review our General Privacy Notice regularly and will place any update on this page. This Privacy Notice was last updated on 13<sup>th</sup> November 2019.