

# Blacks Privacy Policy

**This privacy policy explains how Blacks Limited (Blacks) uses any personal information we collect about you.**

**Why we keep personal data:** We keep any personal data which is required to satisfy our legal obligations, to fulfil any contractual obligations to you and to pursue our legitimate interests of running our members' club, venue hire. We will also use your contact details to give you important information regarding your membership via our Membership Information letter (behind the black door). You have the right to withdraw your consent at any time

**Correction and access to your information:** We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. You have the right to object to or restrict processing of your data or to erase your personal information. We will, however, still need to keep or process some of your data if it is legally or contractually required and such restrictions or erasure may adversely impact on our ability to deliver services to you. You also have the right to request a copy of the information that we hold about you.

**How to contact us:** email us [dataprotection@blacksclub.com](mailto:dataprotection@blacksclub.com) or write to us at Data Protection Lead, Blacks, 67 Dean street, London. W1D 4QH

**Changes to our privacy policy:** We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated in April 2018.

**Use of third party data processors:** Third party data processors are used for certain processes (detailed below) so that we can provide a more efficient or effective service. Where relevant, data is encrypted. The terms and conditions or contracts we have in place with these data processors specify they will keep your data safe and only use it in accordance with GDPR (General Data Protection Regulation) or that they are compliant with Data Protection Act 1998 and working towards GDPR.

**How we keep your data secure:** We aim to be fully compliant with GDPR. We believe our systems to be secure. We have a firewall, password policies, malware and patching in place. We are in the process of obtaining cyber certification. If you use your credit card to pay membership fees we pass your credit card details securely to our payment processing partners as part of the payment process, using SSL encryption. Our card partners are Eazypay and Stripe. Both are authorised by the Financial Conduct Authority under the Payment Services Regulations 2009 and you can find out more here: <https://www.eazipay.co.uk> Stripe is certified to PCI Service Provider Level 1 and you can find out more here: <https://stripe.com/docs/security>

**Complaints:** If you believe there is a problem with the way we are handling your personal information then please contact us at [dataprotection@blacksclub.com](mailto:dataprotection@blacksclub.com). You also have the right to contact the Information Commissioner's Office to complain.

**Cookies:** Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information about cookies visit <https://www.aboutcookies.org> You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

<b>What personal data is kept by Blacks Limited</b>	<b>How we keep your data</b>	<b>How long we keep your data and why</b>
<p><b>Club members and guests</b> When you apply to be a member of the club you provide your name, address, telephone number, email address and date of birth to us.</p>	<p>We store your data on our membership database so that we can assess your eligibility and process your membership application. Some data may be stored on our email system if we enter into further communication with you.</p>	<p>We may keep your data for up to 6 months while the application process takes place. If your application is successful and you decide to join the club, please see section below. If you decide not to pursue your application, we keep your data for up to 3 months after your initial invoice while you finalise your decision.</p>
<p><b>Club members and guests</b> When you become a member of the club we retain the above data.</p>	<p>We store your data on our membership database so that we can fulfil our contractual obligations to you. Some data may be stored on our email system if we enter into further communication with you. We store your name and contact details on our finance database so that we can maintain appropriate financial records.</p>	<p>We keep your data on our membership database and email system throughout your membership and for up to seven months following your last unpaid renewal invoice in case you change your mind. We keep your name and contact details on our financial database and any communications regarding your financial transactions with us for up to 6 years to be compliant with Companies Act 2006.</p>
<p><b>Job applicants</b> If you apply for a position with, you will need to provide us with your name, telephone number, address, email address and employment history. If you are offered a position, we will also obtain a reference from previous or existing employer(s) and an employment agency where relevant. We may also require more details about your background in certain cases.</p>	<p>We store your job application documents, references, specific additional material obtained post interview and any communication with you or relevant third parties on our email and management systems. We also keep hard copies of interview notes in locked filing cabinets. This information is only accessible by those individuals directly involved in the recruitment process.</p>	<p>If you are not appointed, we may keep your recruitment documents for up to 6 months after an appointment has been made in case we want to approach you in relation to other opportunities or to provide feedback on the recruitment process. In certain cases, it may be necessary to retain documents for longer than this for legal purposes. If you are appointed, you will receive an employees' privacy policy.</p>
<p><b>Contractors</b> If we enter into a contract for services with you, you provide us with your name, telephone number, address, email address and bank account details.</p>	<p>We store your name and contact details on our finance database and account details on the banking system so that we can fulfil our contractual obligations to you and maintain appropriate financial records. Some data may be stored on our email system if we enter into further communication with you. We may also store your data on a relevant database depending on the nature of the contract.</p>	<p>We keep your name and contact details on our financial database and any communications regarding your financial transactions with us for up to 6 years to be compliant with Companies Act 2006.</p>