



Privacy Policy

1. Introduction

Here, at Privée Limited, we are committed to the protection of the privacy of Personal Data and to compliance with the GDPR (General Data Protection Regulations) and the PECR (Privacy and Electronic Communications Regulations).

The Privacy Policy set out below details what Personal Data we collect, why we collect it, how we will use it, how long we will keep it for and the controls and rights the Data Subject has with regards to the data.

2. Definitions

“Personal Data” is information that can be used to directly or indirectly identify an individual, like name, address, email address, telephone number.

“Data Subject” is the natural entity to which the Personal Data relates

“User” is a natural entity with which The Privée Limited has an established relationship (for example an employee, supplier, client, etc.)

“Web Visitor” is an individual visiting our front-end website at www.priveeconcierge.co.uk.

“Members” is a natural entity who is a member of Club Privée.

3. Data Controller

Privée Limited is a “Data Controller” as defined by the General Data Protection Regulations and can be contacted on all matters regarding this Privacy Policy at:

GDPR
36 Queen Anne Street
London. W1G 8HF
02076370414
gdpr@priveeconcierge.co.uk

4. Base principles

In formulating our policy we have adhered to the following principles:

- Transparency with regards to the collection and use of data and that only data deemed essential for a specific purpose is collected
- The collected data will only be used for the purpose specified
- That all processing is lawful, fair, transparent and necessary for a specific purpose
- That data is accurate, kept up to date and removed when no longer necessary
- That data is kept safely and securely employing where possible risk-based approaches and privacy-by-design principles.

5. Collection and use

The following sections cover the specifics of each of the three groups from which data is collected: website Visitors, Candidates and Users.

5.1 Website Visitors

5.1.1 General

As a general Visitor you can visit our website without giving away any personal information. Privée Limited uses Google Analytics and Cookies in order to provide the metrics that will allow us to improve our website and to provide a better user experience. The data collected by Google Analytics are anonymous traffic data including browser information, device information and language. This information is used only to provide a general overview of how the Privée Limited website is assessed and used.

Cookies may also be also used by add-on applications used by the site (like Vimeo and Live chat).

No additional information is collected beyond this. (The IP address of the visiting computer is known to Google but this information is not accessed or used by Privée Limited)

5.1.2 Contacting Privée Limited

If you contact us via the website, information about you will be collected. It will be information you fill in the contact page and include personal data such as your name, email address, organisation which will be processed and stored in order for us to effectively deal with and respond to your request. No further use will be made of the data.

5.2 Members

When you apply for membership with Club Privée you will be asked to provide Personal Data such as your name, address, email, address, telephone number, credit-card number, etc.

This is used by Privée Limited to identify and provide members with support, services, newsletters, renewals, billing and to meet contractual obligations.

These data will also be used by Privée Limited (only) to inform members of forthcoming events, discounts and other relevant sales and promotion.

5.3 Users

Privée Limited necessarily processes and stores personal data of Users as part of its operations. All processing of these data is lawful and the legality, depending on the activity involved, based on:

- the legitimate interests of the controller
- necessary for performance of contract

Appendix 1 provides further information on the personal data held, how they are used and the legal processing basis employed for the processing of personal data.

6. Data retention and deletion

Privée Limited will keep your personal data in accordance with our internal data retention policies which is based on the minimum retention period required by law. We will only keep personal information beyond this period if there is a legitimate and provable business reason to do so.

7. Data Security

Through the use of appropriate technical measures we will make sure that any information you have given us is protected from unauthorized access, use or disclosure, loss.

8. Data Transfers

The processing of Personal Data is strictly limited to the specific purposes for which they are gathered. Such processing is done within Privée Limited and, where applicable, members of the group. In limited instances Personal Data is shared with 3rd parties for the purposes of the provision of its contractual services.

Personal data is not transferred out of the EEA.

9. Natural person (Data subject) rights

Under GDPR, as the natural person to which the personal data relates, you have, depending on the circumstance, the following rights:

- The right to be informed – you have the right to be informed in a clear, transparent and concise manner how personal data is collected and processed
- The right of access - you will have the right to know what information is held about you and how it is processed. The first data access request is free but subsequent ones may be subject to an administrative charge. Your data copy will be sent to you by electronic means
- The right of rectification – you will be entitled to have personal data corrected if it is inaccurate or incomplete.
- The right to erasure (or 'the right to be forgotten') – you have the right to have your personal data deleted or removed.
- The right to restrict processing – you have the right to block or suppress processing of your personal data.
- The right to data portability - allows you to obtain your personal data in a commonly used and machine readable format for your own purposes across different services or to transfer this to another organisation.
- The right to object or withdraw consent - you are entitled to object to your personal data being used (for example your personal data for direct marketing) or withdraw a previously given consent.
- Rights relating to automated decision making and profiling - you can choose not to be the subject of a decision based on automated processing

On matters concerning or exercising these rights please contact the Data Controller at the address given above.

10. Scope

This Privacy Policy is applicable only to the Privée Limited Co Ltd and its website www.priveeconcierge.co.uk.



This version of the Privacy Policy is effective from 1st May 2018.

11. Policy Acceptance and Changes

This Privacy Policy is an integral part of The Privée Limited's terms of use and continued use of the website and our platform implies acceptance of this Privacy Policy. If you are disagree with this policy please refrain from accessing the website and platform

Privée Limited reserves the right to amend or change this Privacy Policy in line with best current privacy practises and the prevailing legislations. All changes to our Privacy Policy will be displayed on this website. For reference the previous versions of this Policy can be found here.

Appendix I.

We may collect and process the following personal data about you

Data Class	Data class examples	Usage Examples
Contact	Name, address, email address, job title, telephone, etc.	- Fulfilment of Services requested - Sending weekly newsletter and marketing material

Privée Limited rely on the following basis, depending on the activities carried out, for the lawful processing and storing of the personal information:

- For the performance of a contract or agreement that Privée Limited has entered into with the data subject. An example is the Membership contract
- Legitimate interest, where it is in the legitimate interest of Privée Limited to collect, process and store your personal data to provide the company with information required to provide our services more effectively and to run the business in an efficient and proper manner. In adopting this basis Privée Limited has carried out an assessment of its interest in using personal data against the interest of the data subject as a citizen and their rights under data protect laws.
- Consent. Where you have given us consent to process the information.