LET'S TALK ABOUT YOUR DATA

Kings Life Limited Privacy Notice

Purpose of this document

Kings Life Limited ("Kings Life", "we", "our" and "us") is committed to protecting and respecting your privacy.

This privacy notice (this "**Notice**") details how we collect, use, disclose, transfer and store your personal information in connection with your relationship with Kings Life, and in particular for your use of Kings Life's facilities, equipment and services (the "**Services**"), in accordance with data protection legislation.

Kings Life is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This Notice applies to current and former members and guests of Kings Life. This Notice does not form part of any contract to provide services, and we may update this Notice at any time. Where applicable this notice also applies to all Club visitors, including visitors to the 1857 Sports Lounge & Bistro at Kings.

It is important that you read this Notice, together with any other privacy notice we may provide on specific occasions when we are processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

Kings Life will comply with data protection law. This means that personal information we hold about you must be:

- Used in a lawful, fair and 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 what is necessary for those purposes;
- Accurate and kept up-to-date;
- Kept only for as long as necessary for the purposes we have told you about; and
- Kept securely.

The kind of information we hold about you

Personal information, or personal data, means any information about an individual from which that person can be identified. It does not include anonymised data where the identity has been removed.

There are also "special categories" of data of more sensitive personal information that require a higher level of protection.

Kings Life will collect, store, and use the following categories of personal information about you:

- Personal contact details, such as name, title, residential addresses, telephone numbers, and personal and company/employment email addresses;
- Date of birth;
- Gender;
- Emergency contact information (Name, Relationship & Telephone Number);
- Marital status;
- Joining source;
- Weight;
- Height;
- Photograph;
- Employment location;
- Employment department;
- Employment point of contact;
- IP addresses;
- Browser Cookies;
- Posts on social media;
- Bank account and payment card details;
- CCTV footage and other information obtained through electronic means such as swipe card records;

Kings Life may also collect, store and use the following "special categories" of more sensitive personal information about you:

- Information about your health, including information about any medical condition, injury or illness;
- Genetic information and biometric data;
- Data that could be misused for fraud;

How your personal information is collected

Kings Life collects personal information (in both electronic and/or paper form) about its members, guests and visitors through application and consent forms and data capture forms/applications, either directly from its members and guests, or sometimes from a third party that provides health or fitness equipment or services that our members, guests and visitors can use.

Health, genetic and biometric information

Kings Life may collect, use and otherwise process information about your health, including information about any medical condition, injury or illness, and your genetic and biometric information to assess your readiness for physical exercise, to make a decision and determine the terms for your use of Kings Life's Services and for your actual use of such Services.

Kings Life's Services may, from time to time, be provided by third parties, who may also collect, use and otherwise process your health, genetic and biometric information so that you can use those Services. Those third parties may also ask for your consent to collect, use or otherwise process your heath, genetic or biometric information before you can use the Services.

We will also collect additional personal information in the course of you using Kings Life's Services.

How we will use your personal information

We will only use your personal information when the law allows us to. Most often we will use your personal information in the following circumstances:

- Where we are performing a contract that we have entered into with you for goods or services;
- Where we must comply with a legal obligation; or
- Where it is necessary for our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below:

- To make a decision about your application to become a member, guest member or visitor of Kings Life, and about your continued membership;
- To make a decision about, and determine the terms for, your use of Kings Life's Services;
- To carry out our obligations arising from any contracts entered into between you and us;
- To provide you with the information and the Services that you request from us including, for example, to administer your membership to Kings Life, to facilitate bookings of classes and appointments and to facilitate the provision of certain services to us by third party service providers and other transactions;
- To provide you with Club Communications as appropriate, including but not limited to, member notices, facility and refurbishment updates, subscription rate changes, bank holiday opening hours, unexpected Club closure, nearby road closures etc.
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- To maintain membership records;
- To send you newsletters and promotions and to conduct surveys, prize draws, competitions and other promotions via email, telephone or post;
- Processing payments for Kings Life membership, guest and visitor fees, including issuing invoices and preparing direct debits and standing orders;

- To conduct data analytics studies to review and better understand your use of Kings Life's Services;
- Business management and planning, including accounting and auditing;
- Complying with our health and safety obligations;
- Dealing with legal disputes involving you, or Kings Life's employees, workers and contractors;
- To prevent crime and fraud;
- To monitor our information and communication systems to ensure compliance with our IT policies; and
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

Sensitive personal information (special category personal data)

Higher levels of protection are required for "special categories" of particularly sensitive personal information, and Kings Life needs to have further justification for collecting, storing and using this type of personal information.

Subject to your consent, Kings Life may collect and use particularly sensitive information about your health, including information about any medical condition, injury or illness, and genetic information and biometric data. Kings Life may use such special categories of personal information in the following circumstances:

- To assess your readiness for physical exercise to use Kings Life's Services;
- To make a decision about, and determine the terms for, your use of Kings Life's Services; and
- For your actual use of King Life Services.

Kings Life may collect and use your special categories of personal information without your consent in the following circumstances:

- To comply with our legal obligations, including our health and safety obligations;
- To deal with legal disputes involving you, or Kings Life's employees, workers and contractors; and
- Where it is needed to protect your vital interests (or someone else's vital interests) and you are not capable of giving your consent, or where we cannot reasonably be expected to obtain your consent.

Failure to provide information

If you fail to provide certain information when requested, we may not be able to perform the contract and provide goods or services to you, including access to, and use of, Kings Life's Services, or we may be prevented from complying with our legal obligations (such as protecting your health and safety).

Changing purposes

Kings Life is only permitted to use your personal information for the purposes for which we have collected it, unless we reasonably believe that Kings Life needs to use it for another purpose, and that purpose is in compatible with the original purpose(s). If Kings Life do need to use your personal information for another purpose, we will notify you and explain the legal basis which allows us to do so, unless we are prevented from informing you under the law.

Please be aware that Kings Life may use your personal information without your knowledge or consent in accordance with this Notice, or in order to comply with, or where it is permitted by, the law.

Your consent

Please be aware that we do not need your consent to use your special categories of your personal information in order to carry out our legal obligations. In limited circumstances, we may approach you for your written consent to allow us to process particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us. However, if you do not consent you may be prevented from using Kings Life.

In the limited circumstances where you may have provided your consent to the use of your personal information for a specific purpose, you have the right to withdraw your consent at any time. To withdraw your consent, please contact Helena Pearson, Operations Manager. Once Kings Life has received notification that you have withdrawn your consent and you have completed the required paperwork in full and to the satisfaction of Kings Life in which to do so, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. Kings Life may use automated decision-making in the following circumstances:

- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights; and

- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have your explicit written consent, and we must also put in place appropriate measures to safeguard your rights.

Family members and guests

Kings Life will also collect, use and otherwise process personal information about your joint members, other family members and guests, including family members or guests under the age of 18. It is important that your joint members, other family members and guests have read and understood this Notice.

In relation to a family member or guest who is a child under the age of 16, the person who has parental responsibility for that child must confirm that they have read and understood this Notice on behalf of the child. Kings Life may request information from you to confirm that you have parental responsibility for any child on whose behalf you are confirming that you have read and understood this Notice and, where required, you consent to the collection, use and other processing of that child's personal information.

Information sharing

Kings Life may have to share your personal information with third parties, including third-party service providers and other companies related to Kings Life.

We require third parties to respect the security of your personal information and to treat it in accordance with the law.

Kings Life may transfer your personal information outside Guernsey and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Reasons for sharing personal information with third parties

Kings Life may share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

Third party services providers

Third party services providers may include Kings Life's contractors, agents and advisers, other entities and companies related to Kings Life, payment and credit service providers, banks, insurers, IT services, healthcare professionals, and health, fitness and wellness products and services providers, which may be added to or changed from time to time.

Kings Life's Services may be provided by third parties who may use and otherwise process your personal information, including genetic data, biometric data and data concerning health that has been collected whilst you use our Services.

Such third parties may also be data controllers, and it is important that you take time to read and understand those third parties' privacy notices that may be displayed on or via the Services that they have provided.

Security of information with third parties

All of Kings Life third party services providers, and other entities in Kings Life's group, are required to take appropriate security measures to protect your personal information in accordance with Kings Life policies. We do not allow our third party services providers to use your data for their own purposes, unless they have received your consent or it is necessary for the performance of a contract between you and the third party services provider or Kings Life. We will only permit third party service providers to use your personal information for such specified purposes and in accordance with our instructions.

Sharing information within Kings Life related companies

Kings Life may share your personal information with Kings Life related companies for the purposes of performing a contract with you, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring, for facilities, equipment and systems maintenance and support, and hosting of data.

Other third parties

Kings Life may share your personal information with other third parties, for example in the context of the possible sale or restructuring of Kings Life. Kings Life may also need to share your personal information with regulatory and law enforcement authorities and otherwise to comply with the law.

Transferring personal information to third parties outside Guernsey and the EU

In the event that it is necessary for Kings Life to transfer your personal information to a country or territory that is outside of the Bailiwick of Guernsey or the EU, Kings Life will inform you of the name of that country or territory and the purpose for the transfer. Kings Life will also inform you whether that country or territory has an adequacy decision by the European Commission. If the country or territory does not have an adequacy decision, that country or territory is not deemed to provide an adequate level of protection for your personal information.

To ensure that your personal information receives an adequate level of protection, Kings Life will put in place appropriate measures to ensure that your personal information is treated by third parties in countries and territories outside of the Bailiwick of Guernsey and the EU in a way that is consistent with and which respects the Guernsey and EU laws on data protection. If you require further information about these protective measures, you can request it from Helena Pearson, Operations Manager.

Information security

Kings Life has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, Kings Life may limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Kings Life has also put in place procedures to deal with any suspected data security breach, and we will notify you and any applicable regulatory or law enforcement authority of a suspected breach where we are legally required to do so.

Data retention

Kings Life will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for your personal information, we consider the amount and nature of the personal information, whether the personal information is sensitive information (special category personal data), the potential risk of harm from unauthorised use or disclosure of the 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.

Kings Life will keep adult and dependent personal data for 7 years after the date of cancellation or expiry of your Membership, Guest Membership or attendance to the Club as a visitor for the purpose of satisfying statutory legal requirements. After this time your personal data (stored electronically and in paper format) will be destroyed in its entirety.

Kings Life may anonymise your personal information so that it can no longer be associated with you, in which case we may use such personal information without any further notice to you. Once you are no longer a member or guest of Kings Life we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure and restriction

It is important that the personal information Kings Life holds about you is accurate and current. Please keep us informed if your personal information changes whilst you are a member or guest of Kings Life.

In certain circumstances you may have the right to:

- Request access to your personal information ("data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully using it;

- Request correction of your personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected;

- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing;

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes;

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it; or

- Request the transfer of your personal information to another party.

If you wish to review, verify, correct or request erasure of your personal information, object to the use of your personal information, or request that we transfer a copy of your personal information to another party, please contact Helena Pearson, Operations Manager in writing and to request our Subject Access Request (SAR) Form.

Kings Life will not charge a fee for providing access to your personal information (or to exercise any of your other rights). However, Kings Life may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, Kings Life may refuse to comply with your request in such circumstances.

Kings Life may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any other person who has no right to receive it.

Data protection officer

We have appointed a data protection officer (DPO) to oversee Kings Life compliance with this Notice. If you have any questions about this Notice, or how we handle your personal information, please contact the DPO at:

The Data Protection Officer
Kings Life Limited
Helena Pearson, Operations Manager

You have the right to make a complaint at any time to the Data Protection Commissioner or the Data Protection Authority (as applicable) in Guernsey.

Changes to this privacy notice

Kings Life reserves the right to update this Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the use of your personal information.

If you have any questions about this privacy notice, please contact Helena Pearson, Operations Manager on helena.pearson@kings.gg.