

1. INTRODUCTION

1.1) This policy sets out our commitment to you about how we handle your personal information.

1.2) In this Policy, "UTDS" refers to "Upstairs at The Department Store Ltd" registration number 6235577. UTDS is registered with the Information Commissioner's Office (ICO).

1.3) This General Privacy Policy applies to all our dealings with you. It means that you can be sure that when you deal with us as a Guest of UDPS you have the assurance of knowing how we will handle your personal 'data'. For some of our services additional specific privacy terms will apply which are only relevant to that service – for example there are specific privacy terms that relate only to your use of our website. If those additional terms are going to apply, they will be made available to you as part of the initial point of contact for that service.

2. YOUR INFORMATION

What information do we collect?

2.1) The personal information we collect about you is made up of information you give us and some information that others provide to us. It will include information you provide when you apply to become a Guest of UTDS; your use of our website; signing up for events; making bookings and our communications with you.

Sensitive information.

2.2) We do not generally seek to collect sensitive personal information about our Guests. If we do, we will ask for your explicit consent first. We use the expression "sensitive personal information" to mean information about your political or religious beliefs, your ethnicity or private life, for example. We will always try to ensure we only collect information that we need in order to provide the services you have asked for and for essential business management purposes.

Information about other people.

2.3) In certain circumstances it may be that you provide us with personal information (such as name and email address) of another person, a friend or family member, for example. This might be in relation to new Guests through recommendations. If you give us information about another person we accept it on the understanding from you that, the other person is over 18 years of age and that you have already made it clear to that person what you intend to do, that they consent to us receiving that information and you have made them aware that we might contact them for marketing or other reasons relating to our business. You should not provide us with any information about another person if this is not the case.

3. USING YOUR INFORMATION

3.1) We will use your personal information for the following main purposes:-

- (i) To administer your Guest Card and any information, rules and regulations relating to UTDS;
- (ii) To provide you with our website facility and to enhance its functionality
- (iii) For Guest communications including details of events, offers and closures;
- (iv) For subscription renewals and billing;
- (v) For marketing purposes in accordance with your preferences (see below).

3.2) We may also use and disclose your personal information (in aggregate and so that you are not identified individually) for marketing purposes and strategic development purposes.

3.3) We value your privacy and we do not want to send you any unwanted marketing materials. We will only send you marketing materials (or anyone else's) with your express consent.

3.4) You tell us your marketing preferences when you first apply to join. You can change those preferences at any time and we will update our records accordingly. Please bear in mind that it might not be possible to take part in some of our offers if we cannot tell you about them in advance.

4. DISCLOSING YOUR INFORMATION

4.1) We want to keep your personal information safe. We also take care to ensure that we only use your information for the purposes you have agreed to. We take a great deal of care to apply security measures, on and offline, to protect your information from unauthorised access; unlawful use and accidental destruction.

4.2) We may disclose your information to certain third parties and service providers (some of whom may be located outside the EU and the EEA) to collect, store and process your information on our behalf for the reasons set out in this policy. Those third parties are obliged to act only on our instructions and will only process your information in the ways we tell them to.

4.3) We may disclose your information to other third parties such as the police and other government departments or bodies as required by law or if we believe that reporting might help detect or prevent crime or seriously unacceptable behaviour.

4.4) We may give your personal information to other third parties so that they may market their goods and services to you but only with your express consent (see below).

4.5) We will not sell or licence your personal data to any third party except in the unlikely event that we sell our business or a relevant part of it and in order to enable that sale to happen effectively and to allow the purchaser to continue to provide the products and services to you.

5. OTHER TERMS

5.1) You have the right to ask for a copy of the personal information we hold about you (for which we may charge a small fee). Also if you find that some of the information we hold about you is incorrect you have the right to ask us to correct it and we will do as promptly as we can.

5.2) This policy only applies to personal information we hold about you. It does not protect you from any information you might give directly to third parties (whether they be third parties we introduce to you, or to whom you can link via our websites, or third parties entirely unconnected to us). Entirely different rules (and reduced protections) might apply in those circumstances and we encourage you to ask questions first and obtain whatever assurances you need from third parties before disclosing your information to them.

6. CONTACT

You can contact us about any privacy issues or to exercise one of your rights by emailing us at guests@thedepartmentstore.com or calling 020 3598 6970.