

Keystone House Ltd
Keystone Group Priority Card Scheme
PRIVACY NOTICE &
TERMS AND CONDITIONS

1. Scope

All data subjects participating in the Keystone Priority Card scheme and whose personal data is collected in line with the requirements of the GDPR.

2. Responsibilities

- 2.1. The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Keystone House Ltd. collecting/processing their personal data.
- 2.2. All Employees/Staff of Keystone House Ltd. And those working on behalf of Keystone House Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 About Us

Keystone House Ltd provides a Priority Card scheme to patrons and customers of a number of businesses with which it is affiliated, namely;

Keystone House Hostel
The Scottish Stores & Wine Stores
The Wine Stores
The Cuckoo
The Clarendon Hotel & Bar
Sutton Vale Country Park
The Port of Call
The Plough Inn

Additional participating venues may be added to the list from time to time but you would be advised by email of these new venues and you would retain the option to (a) patronise those venues or not as you see fit and (b) withdraw your consent for any venues to process your data as you see fit

Our Data Protection Officer and data protection representatives can be contacted directly here: dpo@keystone-group.net

The personal data we collect and process is detailed below:

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Personal data type:	Source	What the data is used for:
Full Name	Captured via online form submission (at keystone-group.net or individual establishment sites) or in person from nominated management/employees at participating venues.	To assign a named individual to a Priority Card
Email address	Captured via online form submission (at keystone-group.net or individual establishment sites) or in person from nominated management/employees at participating venues.	To enable us to contact you with changes to terms and conditions, special offers at participating venues and to update you on additional services, discounts or promotions within participating venues. No information is provided to third parties other than the participating venues. New venues may be added to the list of participating venues and you'd be notified of this by email.

3.2. Consent

By accepting this privacy notice and our terms and conditions you are giving us permission to process your personal data specifically for the purposes identified. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

Keystone House Ltd always process your data under one of the following legal bases:

- To fulfil our contractual obligations with you
- In the legitimate interests of our business
- To meet our legal and regulatory obligations
- Based on your consent

You may withdraw consent or access your data at any time by requesting and completing a Data Subject Access Request Form.

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By accepting the Terms and Conditions stated below in Section 5 you are giving explicit consent for us to process your data for the purposes described in section 3.1 You can withdraw that consent and/or ask us to cease processing any data by emailing us at dpo@keystone-group.net

3.3. Disclosure

Keystone House Ltd. will not pass on your personal data to third parties without first obtaining your consent, unless the provision of that data is to meet our legal obligations with regulatory or law enforcement agencies.

3.4. Retention period

Keystone House Ltd. will store your personal data for as long as you wish to participate in Priority Card scheme. Where information has to be retained to meet our regulatory or financial obligations, information may be kept up to 7 years, but will be anonymised where appropriate.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Keystone House Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

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All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Keystone you can contact our nominated Data Protection Officer at **dpo@keystone-group.net**

You also have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law:
ico.org.uk

4. Further information

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, Keystone House Ltd. will collect and use your personal data in order to initiate contract with yourself, to provide services and offers.

Why does Keystone House Ltd. need to collect and store personal data?

In order for us to provide you with services and offers we need to collect certain personal data, as detailed above and for the stated purposes. We are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Will Keystone House Ltd. share my personal data with anyone else?

We will not pass your personal data on to third-parties (other than the stated participating venues of the Priority Card scheme) in the course of dealing with you. If we wish to pass your personal data onto a third party we will only do so once we have obtained your express consent, unless we are legally required to do otherwise.

How will Keystone Ltd. use the personal data it collects about me?

Keystone House Ltd. will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Keystone House Ltd. is required to retain information in

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accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Keystone House Ltd. contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Keystone House Ltd., at your request, can confirm what information we hold about you and how it is processed. If Keystone House Ltd. does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Keystone Ltd. or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Keystone House Ltd. accepts the following forms of ID when information on your personal data is requested: Passport, Driver's License, National Photo Identity Card.

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Contact details of the Data Protection Officer / GDPR Representative:

dpo@keystone-group.net

5. Keystone Group Priority Card Terms and Conditions of Use

5.1. These terms and conditions (including the above Privacy Policy which can also be viewed at www.keystone-group.net) govern the issuance and management of the Keystone Priority Card scheme and set out the terms of contract between Keystone House Ltd ("Keystone", "us" or "we") and you the customer relating to the Priority Card scheme. You can join the Priority Card scheme by applying for a Keystone Priority Card in participating venues or online at www.keystone-group.net and you will be issued a Priority Card which can be used to earn discounts and access priority services and products from time to time. If you apply to register with us you accept these terms and conditions and the Privacy Notice detailed above. We may refuse an application to join the Priority Card scheme for any reason at our sole discretion including (but not limited to) risk of reputational damage to us, unreasonable usage, inappropriate behaviour, any reasonable suspicion of previous criminal activity or any previous history of verbal or physical abuse to Keystone staff.

5.2. To register for the Priority Card scheme you will need to complete an application form in a participating venue or register on our website at www.keystone-group.net. A Priority Card will be created in your name and registered against your email address that you provide as part of your application. You must be 18 years of age or over and resident in the UK to join the Priority Card scheme.

5.3. Your Priority Card is issued to you but remains the property of Keystone. You must return your Priority Card to us on request or destroy it if we so reasonably request. You are responsible for the security of your Priority Card, security details relating to your Priority Card and for the transactions made using your Priority Card. You should not share your Priority Card with anyone, including Keystone staff. If you lose your Priority Card or think an unauthorised person is using your Priority Card you should promptly contact us at 0203 384 0430 or at info@keystone-group.net

5.4. Your Priority Card can be used to gain access to selected discounts, offer, promotions and benefits at participating venues only. All offers, discounts and benefits are subject to change without notice and may be applied or withdrawn by participating venues at their discretion. Holding of a Priority Card is not a guarantee of any discount, offer or benefit.

5.5. Your Priority Card is personal to you and cannot be transferred to anybody else. Discounts or offers may only be redeemed in accordance with these terms.

5.6. Your Priority Card cannot be used as a payment or credit card or a guarantee card.

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5.7. The Priority Card scheme is only for consumer use. The Priority Card cannot be used for any transaction where the beneficiary is a business entity or for any other commercial purposes unless specifically agreed with the management/operator of the participating venue where the discount or offer is being redeemed.

5.8. If you materially breach these terms, and where such breach can be remedied, if you do not remedy the breach within 30 days of a written notice of the breach from Keystone or if Keystone reasonably believes that you have breached these terms and/or abused the Priority Card scheme, your Priority Card may be terminated and your Priority Card account closed without prior notice. Keystone reserves the right to take any action deemed necessary where a Priority Cardholder is found to have abused the Priority Card scheme.

5.9. In addition to the above, Keystone reserves the right to (i) stop issuing Priority Cards at anytime if we decide to terminate the Priority Card scheme; (ii) to alter or amend the terms and conditions of operation of the Priority Card scheme by publishing notices on our website www.keystone-group.net and/or (iii) withdraw or cancel the Priority Card scheme without notice.

5.10. Our above Privacy Policy relating to this Priority Card scheme (which can be accessed at www.keystone-group.net) sets out the information that we will collect about you, how we use the information and whom it may be shared with including, but not limited to, details of the promotional information that we hope to provide.

5.11. We will retain your personal information for as long as you are a member of the Priority Card scheme. You may cancel your membership at any time by contacting us at info@keystone-group.net and you can request access to your data in accordance with the Privacy Policy by emailing dpo@keystone-group.net

5.12. The Priority Card scheme is operated and promoted by Keystone House Ltd of 272-276 Pentonville Road, London N1 9JY Registered in the UK under 00718124. For further information please contact info@keystone-group.net