

## Privacy Statement

Ten Lifestyle Management Limited (“Ten”) is committed to protecting your privacy. This Privacy Statement explains how, and for what purposes, we use the information collected about you in connection with your use of the Concierge Service or our Site. Please read this Privacy Statement carefully.

By using the Concierge Service, our Site or Services offered by external Suppliers, you are agreeing to be bound by this Privacy Statement in respect of the information collected about you in connection with the Concierge Service.

**IF YOU DO NOT AGREE TO US COLLECTING AND USING THE INFORMATION ABOUT YOU THEN YOU MUST NOT USE THE CONCIERGE SERVICE OR OUR SITE.**

### Introduction

- A. When you use our Concierge Service or our Site, we may collect certain information about you such as your name, contact details and how you use our Site. We may also collect information about other family members or third parties where you provide information about those individuals through your use of the Concierge Service.
- B. We collect this information about you so that we can: provide the Concierge Service to you; allow Suppliers to provide Services to you; run our business; further develop elements of the Concierge Services; personalise the Concierge Services to your preferences; contact you; and comply with the law.
- C. We may determine the purposes and means of processing personal information that we collect about you when you use the Concierge Service and so act as data controller in relation to that personal information and:
  - i. where you have requested Services from a Supplier, we may disclose your information to Supplier(s) who will process your data for their own purposes as data controllers and/or processors (as the case may be) in relation to providing the Services to you, for example, in order to provide specific quotes or to make a booking; and
  - ii. each Supplier will be responsible for their own use of your information, and Ten does not accept responsibility for such use, except to the extent we have not complied with this Privacy Statement or applicable data protection laws.

Capitalised terms used without definition shall have the meanings assigned to them in the [Concierge Service Terms and Conditions](#).

- 1) How we collect data from you
  - a) We may collect and process the following information in accordance with applicable data protection laws:
    - i) contact information (such as email address or phone number) provided to us when you first use the Concierge Service or provided to us in advance by Revolut Ltd (“Revolut”), to validate such registration;
    - ii) information provided if you contact us via: the online form submission with an enquiry; through any telephone conversation or email exchange with our representatives; or in response to a communication from us. Calls will be recorded for quality control and training purposes which includes the usage of the recordings for the handling of claims and fraud detection purposes. Recordings are kept for a limited amount of time and automatically deleted thereafter, unless we have a legitimate interest to keep such recording for a longer period, including for fraud investigation and legal purposes;
    - iii) we may be provided with certain personal data such as your name, email address and information contained in the correspondence (which could tell us something about your preferences). We need this information to be able to respond to your enquiries and to administer our Site;
    - iv) details of registration, enquiries, discussions, instructions, transactions you carry out in relation to our Site or via phone or email interaction with our representatives, including but not limited to: your name; subject matter which you have expressed as an interest or preference; order information; billing information; address; type of subscription; hashed payment details; including whether payments have been accepted or declined. We need this information to be able to provide the Concierge Service;
    - v) information provided when you visit our Site. We capture access data such as: IP address; browser type and version; time zone setting, browser plug-in types and versions; operating system and platform; date and time of the

- access; articles you have read; requests made; or the amount of data transmitted and the requesting provider. We may also capture other information about visits to our Site such as: website usage; traffic patterns and topics of interest. The main purpose of collecting this information is to administer, maintain and improve our Site (please see section 2. below for further details) and your experience in using our Site; and
- vi) from your IP address, we may be able to identify your city or country of location and this may be used to display geographically relevant information to you on our Site.
- b) Where you provide us with information about other people, you confirm that: (i) you have the consent or authorisation from the individuals to pass this information to us; and (ii) you have notified them of, and they have agreed to, the collection and use of their information as set out in this Privacy Statement.
  - c) We are required to comply with certain legal and regulatory requirements, and may process your personal data for compliance with such legal or regulatory obligations, to which we or regulators or law enforcement agencies are subject.
  - d) Note that if any of your personal details change during your use of our Site, you are responsible for updating them in the Revolut App.
- 2) How your data is used
- a) Any personal data we process will be used in accordance with applicable data protection laws. We have described below our purposes for processing personal data.
  - b) We may use information you give us or that we collect from you:
    - i) to provide the Concierge Service, allow Suppliers to provide Services to you, administer your membership and run our organisation. This is necessary for the performance of the Concierge Services to you;
    - ii) to inform you about changes to our Concierge Service and Services available from time to time:
      - I. we may use personal data to inform you of information, suggestions, recommendations, products and services that may be of interest. You may be contacted by mail, email, telephone or such other means as we regard as appropriate and as legally permitted. Individuals may opt out from this type of communication by calling us, emailing us or going to our Site;
      - II. we will contact you by e-mail only with information about products and services similar to those which you have previously shown an interest in or which you are likely to be interested in based on preferences you have expressed;
- iii) to communicate with you. We have a legitimate interest to process this personal data in order to respond to enquiries, requests, complaints or comments submitted to us;
  - iv) to administer, maintain and improve our Site:
    - I. we use “cookies” to monitor website user traffic patterns and website usage. This helps us to understand how visitors use our Site so that we can develop and improve the design, layout and functionality of our Site. Cookies make it easier for you to log on to and use the website during future visits. A cookie is a piece of information that is stored on your computer’s hard drive and which records your navigation of a website so that when you revisit that website it can present tailored options to you based upon the stored information about your last visit. You can normally alter the settings of your browser to prevent acceptance of cookies. If you do not want us to deploy cookies in your browser, you can set your browser to reject cookies or to notify you when a website tries to put a cookie on your computer. However, rejecting cookies may affect your ability to use some of the products and/or services at our Site. For more information about what cookies are and how they work, visit: <http://www.allaboutcookies.org/>;
    - II. we have a legitimate interest to process the personal data of our users in order to administer, maintain and improve our Site;
  - v) to notify you about functionality changes to the Site, or changes to this Privacy Statement. This processing is necessary for the performance of our Concierge Services to you;
  - vi) for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. We have a legitimate interest to process the personal data of our users for our internal operations;
  - vii) to allow you to participate in interactive features of our Concierge Service. This processing is necessary for the performance of these Concierge Services to you;
  - viii) as part of our efforts to keep our Site safe and secure. We have a legitimate interest to process the personal data of our users to keep our Site safe and secure; and
  - ix) to comply with any legal or regulatory obligations to which we or regulators or law enforcement agencies are subject. This processing is necessary for compliance with a legal obligation to which we, our users or the regulator/law enforcement agencies are subject.
- c) If you have any questions about how we use your data, please contact Ten’s Data Protection Officer

at Ten Lifestyle Group, Fitzroy House, 355 Euston Road, London, NW1 3AL or email or phone the Concierge Service and ask to be transferred to our Data Protection Officer.

3) How we look after your data

We follow strict guidelines in the storage and disclosure of personal data and communications that you have given us to prevent unauthorised access to it.

4) When do we give your data to other people?

a) We may share your information (including any of the data we have collected as mentioned in section 1. above) with selected third parties including Suppliers and other third parties for the performance of any contract you enter into with them or otherwise required to provide the Concierge Services and Services to you.

b) We may share data we collect about you with Revolut to allow them to:

- i) provide you with a broader range of related products and services;
- ii) manage their relationship with you and understand your needs or preferences based on your use of lifestyle concierge services (including contacting you about products and services tailored to your needs), and

c) We may also share other aggregated, anonymised information with Revolut to show trends about the general use of the Concierge Service.

d) We may disclose your information (including any of the data we have collected as mentioned in section 1. above) to third parties:

- i) in the event that we sell any part of our business, in which case we may disclose your personal data to the prospective buyer of that part of our business to the extent that such disclosure is directly relevant to the sale; and
- ii) if we are under a duty to or permitted to disclose or share your personal data in order to comply with any legal or regulatory obligations, or in order to enforce or apply this Privacy Statement and other agreements; or to allow a Supplier to enforce or apply its contract with you. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5) Where we store your data

a) By using the Concierge Service, you acknowledge that in order to perform the Concierge Service, allow you to receive the Services from Suppliers or work with Revolut in relation to the Concierge Service, we may need to transfer your personal data outside of your country to countries where Ten has an office or to countries where a Supplier is needed to fulfil a request for you. These countries may not have the same data protection laws as the country where you initially provided the

information. When we transfer or disclose your information, we will protect that information as described in this Privacy Statement.

b) Where we transfer your personal data outside of the country in which you are based, we will rely on appropriate safeguards to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses, or applicable data protection laws in your country.

6) Retention of your data

a) We take appropriate measures to ensure that any personal data is kept secure. We will store your personal data for the duration of your use of our Site or the Concierge Service. Thereafter your data may be shared with Revolut, and / or any third party as instructed by Revolut, for the continuation of the Concierge Service.

b) If your access to the Concierge Service expires or is terminated, we will continue to store your personal data for a period of time in line with legal, regulatory, financial and business requirements. We also keep a record of correspondence in line with legal, regulatory, financial and business requirements.

7) Access to your data and your rights

a) As a result of us collecting and processing your information, you may have the following legal rights subject to the data protection laws in your country

- i) to access personal data held about you;
- ii) to request us to make any changes to your personal data if it is inaccurate or incomplete;
- iii) to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances;
- iv) to receive your personal data provided to us as a data controller in a usable way in certain circumstances;
- v) to object to, or restrict, our processing of your personal data in certain circumstances;
- vi) to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you;
- vii) where our processing of your personal data is based on your consent you have the right to withdraw consent at any time by contacting us; and
- viii) to lodge a complaint with a data protection supervisory authority. If you need the details of the data protection supervisory authority in your country, if any, please contact the Concierge Service and we will be able to provide this information.

b) To exercise any of your rights as set out above, please contact Ten's Data Protection Officer, Ten Lifestyle Group, Fitzroy House, 355 Euston Road,

London, NW1 3AL or email or phone the Concierge Service and ask to be transferred to our Data Protection Officer.

## 8) Links

- a) Our Site may, from time to time, contain links to and from other websites and services, for example third party payment processors. If you follow a link to any of these websites, please note that:
  - i) we are not responsible for the content or reliability of websites linked to or from our Site;
  - ii) we do not necessarily support the views expressed within linked websites and our

- including a link to a website should not be taken as an endorsement of any kind;
- iii) we cannot guarantee that these links will work all of the time and have no control over the availability of the linked pages; and
- iv) these linked websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

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