



## Partner / Supplier Privacy Notice

### 1. Introduction

This privacy notice aims to give you information on how Ten Lifestyle Management Limited (Ten) has collected and will process the following categories of personal data about you:

- the Materials (as defined in the agreement between you and Ten to which this privacy notice is attached as Schedule 1); and
- any related contact details (the Related Personal Data).

This privacy notice only relates to how we will process the Materials and the Related Personal Data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### 2. Important information and who we are

#### Controller

The Ten Lifestyle Group, of which Ten Lifestyle Management Limited is a part, is made up of different legal entities. This privacy notice is issued on behalf of Ten Lifestyle Group so when we mention "Ten" "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Ten Lifestyle Group responsible for processing your data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

#### Contact details

Our full details are:

Full name of legal entity: Ten Lifestyle Management Limited

Name of DPO: Keziah Watt

Email address: [keziahwatt@tengroup.com](mailto:keziahwatt@tengroup.com)

Postal address: Ten Lifestyle Management Limited, Fitzroy House, 2nd Floor, 355 Euston Road, NW1 3AL, United Kingdom

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

**Ten Lifestyle Group**  
Global Head Office  
Fitzroy House, 2<sup>nd</sup> Floor, 355 Euston Road  
NW1 3AL, United Kingdom  
T: +44 2033016300 F: +44 2033013038

[Tengroup.com](http://Tengroup.com)

**Ten Lifestyle Management Limited**  
Registered in England and Wales  
Company No: 04688658  
Registered Office: Floor 2 355 Euston Road  
London, England, NW1 3AL

### 3. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 4. The data we have collected and how it was obtained

We have collected the Materials and Related Personal.

### 5. How we will use your personal data

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

- On the basis of your consent.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. (For more information on the meaning of legitimate interests, see paragraph 12.)
- Where we need to comply with a legal or regulatory obligation.

### 6. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate references to Purpose, Materials and Related Data are as defined in the agreement to which this privacy notice is attached as Schedule 1.

Purpose of processing your data	Data	Lawful basis for processing including basis of legitimate interest (if applicable)
Storage, publication and transmission, electronically or otherwise for the purpose of inclusion in communications to customers or prospective customers	Photograph / Video / Audio	Consent
Managing our relationship with you, including: <ul style="list-style-type: none"><li>• Notifying you of changes to our privacy policy.</li><li>• Storing your contact details so that we can contact you.</li><li>• Keeping a record of your consent.</li></ul>	Photograph / Video / Audio, Related Data	Necessary for our legitimate interests (to maintain a record of your contact details in case we need to contact you regarding the Photograph/Video).

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## 7. **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 8. **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 6 above.

- Internal Third Parties including Ten Lifestyle Group companies.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 9. **International transfers**

We share your personal data within Ten Lifestyle Group. This will involve transferring your data outside the European Economic Area (EEA).

We ensure your personal data is protected by requiring all Ten Lifestyle Group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules".

## 10. **Data security**

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

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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## 11. Data retention

We will only retain the Materials and Related Data 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 personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 12. Your legal rights

You have, in connection with your personal data, under certain circumstances, the right to:

- **Request access** to your personal information (commonly known as a "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 processing it.
- **Request correction** of the personal information that we hold about you. 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 process 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 (see below).
- **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.
- **Request the transfer** of your personal information to another party.
- **Withdraw consent at any time** in relation to our use of the Materials for the Purpose, in relation to which are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the DPO in writing.

If we receive notification that you have withdrawn your consent to the use of the Materials for the Purpose, we will no longer process the Materials for the Purpose and, subject to our retention policy, we will dispose of the Materials securely. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

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13. **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

14. **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

15. **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

16. **Glossary**

**LAWFUL BASIS**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting the DPO.

**THIRD PARTIES**

Internal Third Parties

Other companies in the Ten Lifestyle Group acting as joint controllers or processors and who are based in Argentina, Australia, Brazil, Canada, China, Colombia, Hong Kong, Japan, Mexico, Singapore, South Africa, Switzerland, United Arab Emirates, United Kingdom, United States of America and provide storage, publication and transmission of communications to customers or prospective customers .

External Third Parties

- Service providers acting as processors based in the EEA or outside of the EEA who provide IT and system administration services and with whom we have binding data privacy agreements in place.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Marketing or PR agencies who provide marketing materials and communications which may include the Materials

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