

## Privacy Policy

We are MBH Group (UK) Limited. We, together with our affiliated companies, run a group of private members clubs including Annabel's, Mark's Club, Harry's Bar, George and the Bath & Racquets Club ("**Clubs**"). We also operate websites in relation to the Clubs ("**Sites**") that give you, as the user of a Site or the member of a Club ("**you**") information about the Clubs and the events, products and services we offer, including our "Club Life" service (our "**Offerings**"). A list of all the Clubs and Sites operated by us can be found at [www.harrysbar.co.uk](http://www.harrysbar.co.uk).

We take your privacy rights very seriously and this privacy policy ("**Privacy Policy**") explains how certain information about you may be processed. By registering as a member of a Club, you expressly consent to the use of Your Data (as defined in paragraph 1.1) in accordance with this Privacy Policy.

### 1. **YOUR DATA**

1.1 "**Your Data**" means any information about you from which you may be personally identified including:

1.1.1 your name, address, email address, user name and password; and

1.1.2 any other information from which you can be identified and which you may disclose to us via the Sites, at the Clubs or otherwise at any time.

### 2. **WHEN DO WE COLLECT YOUR DATA?**

2.1 We collect Your Data from you when you:

2.1.1 register as a member of a Club;

2.1.2 make a complaint or enquiry or provide other feedback through a Site; or

2.1.3 disclose Your Data to us through a Site, at a Club or otherwise at any time.

### 3. **HOW DO WE USE YOUR DATA?**

3.1 We use Your Data to:

3.1.1 monitor, develop, provide and improve the Clubs, the Sites, our Offerings and your overall experience with us;

3.1.2 process your registration as a member of a Club and administer your membership account;

3.1.3 in accordance with your marketing preferences, send you and keep you updated with information by email and post about the Clubs, the Sites and our Offerings, including events, special offers and competitions which may include promotions offered with selected third parties;

- 3.1.4 process and deal with any complaints or enquiries made by or about you (including the undertaking of any fraud investigation required); and
  - 3.1.5 monitor and investigate any suspected breach by you (or otherwise relating to you) of this Privacy Policy, the membership rules of the Clubs or the terms and conditions of use of the Sites.
- 3.2 You can change your mind and choose to receive or not to receive communications pursuant to paragraph 3.1.3 at any time by sending an email to [membership@harrysbar.co.uk](mailto:membership@harrysbar.co.uk) or by using the relevant Unsubscribe link which we include in each promotional email.

#### 4. **WILL WE PASS ON YOUR DATA TO THIRD PARTIES?**

- 4.1 We will never sell or pass on Your Data to third parties for marketing purposes without your express consent.
- 4.2 We only pass on Your Data to third parties as follows:
  - 4.2.1 we may pass Your Data to our employees, agents, subcontractors and our affiliated companies (including those that run our other Clubs) to administer your membership and the Offerings provided to you by us now or in the future;
  - 4.2.2 in some cases we may use a technical partner to conduct some processing of Your Data on our behalf, but this is always subject to strict contractual control and in compliance with UK data protection legislation; and
  - 4.2.3 we may need to disclose Your Data to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence or suspected breach by you (or otherwise relating to you) of this Privacy Policy, the membership rules of the Clubs or the terms and conditions of use of the Sites.
- 4.3 In addition, some general statistical information about the Clubs' members and the Sites' user base may be passed on to reputable third parties for research purposes but these details will never include information personally identifying you.

#### 5. **DATA SECURITY**

- 5.1 We will take all reasonable steps to protect Your Data. All the Data collected by us is stored on a secure server. The secure server software encrypts all information you input before it is sent to us.
- 5.2 Always think carefully before disclosing Your Data to others. We recommend that you do not share any username and password with others.

#### 6. **COOKIES**

6.1 Cookies are small pieces of information stored by your browser on your computer's hard drive. We use cookies to allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of the Sites. Most web browsers automatically accept cookies, though you do not have to. We do not control the use of cookies by third parties. If you wish to disable cookies then you can do so by readjusting your browser settings although please note that by disabling cookies you may not be able to use all features of the Sites.

6.2 For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 7. **ACCESSING AND UPDATING YOUR DATA**

You must make sure that you update us with changes to Your Data as soon as possible. You can do so by emailing or writing to us via the details set out in clause 11 below.

## 8. **OTHER LINKS**

Please be aware that the Sites may link to other web sites which may be accessed by you through our Sites. We are not responsible for the privacy policies, content or security of those linked web sites.

## 9. **GENERAL**

In this Privacy Policy, any phrase introduced by the terms "include" or "including" shall be construed as illustrative and shall not limit the sense of the words preceding those terms and shall be deemed to include the phrase "without limitation".

## 10. **INFORMATION ABOUT US**

10.1 We are *MBH Group (UK) Limited* a company registered in England and Wales under registration number *06227148*. Our registered address is *26-28 Conway Street, London W1T 6BQ*.

## 11. **CONTACT US ABOUT PRIVACY**

If you have any comments or queries or complaints in connection with our Privacy Policy, please contact us by email at [membership@harrysbar.co.uk](mailto:membership@harrysbar.co.uk) or write to us at **The Membership Office, Annabels Limited, 46 Charles Street London W1J 5EJ**.

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This Privacy Policy was last updated on *1/5/09*