

Privacy Notice

Ivy House Community Pub Limited (Company No. IP031957) ("Ivy House", "we") is committed to safeguarding your privacy. At all times we aim to respect any personal information you share with us, or that we receive from other organisations, and keep it safe. This Privacy Notice ("Notice") sets out our data collection and processing practices and your options regarding the ways in which your personal information is used, when you provide your personal information for the purpose of applying to purchase shares in Ivy House.

This Notice contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal information. We may update this Notice from time to time and will notify you accordingly.

The provision of your personal information to us is voluntary. However, without providing us with the personal information requested in this application form, we will be unable to process your shareholder application.

1. How we collect your personal information?

For the purposes of this application, we collect your personal information when you give it to us directly by providing the details requested by this form. We may also collect your personal information where you have given permission to other organisations to share it or when you visit our website to complete this application online. If you use our website you should read our online Cookie Policy (located below the share ordering form on this page) to understand how we use cookies or other tracking technologies.

2. What personal information do we collect & use?

For the purposes of this application and your continued status as a shareholder, we collect and store the following types of personal information:

Your name; Your date of birth; Financial details, such as credit or debit card information; The size of your shareholding and amount paid/considered as paid on the shares; Information about other property held in Ivy House (for example, loans or deposits) The date on which you are entered on Ivy House's internal register of members as a member; The date on which you cease to be a member of Ivy House as recorded on our internal register of members; and Your contact information (telephone number, physical address and email address). If you fill out this application online, we may collect information about your computer and your visits to our website, including your IP address, geographical location and browser type. Please see our online Cookie Policy for further information.

For the purposes of this application, we do not process any sensitive personal information.

3. How & why will we use your personal information?

For the purposes of this application, your personal information will be used for the following purposes:

to process your application to buy (additional) shares in the Ivy House; for our internal administrative and management operations, such as record-keeping and statistical research; to communicate with you for non-marketing purposes about your shareholding in the Ivy

House; to register you as a shareholder internally and at the MPR; to handle the administration of payments received from you; to pay you dividends commensurate with your shareholding; to satisfy legal obligations which are binding on us; to prevent fraud, misuse of services or money laundering; or to establish, defend and/or enforce legal claims.

4. Security of & access to your personal information

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure of or access to your personal information.

In particular, your personal information will only be accessible by appropriately trained staff and will be stored within a computerised database protected by anti-virus software and password access.

We are required to communicate information to Members of the Society regarding AGMs and other meetings. For this reason, we add shareholders' email addresses to an email mailing list maintained by Mailchimp. You can view Mailchimp's privacy policy [here](#). Subscribers to the list can update their preferences at any time by following the links in any email we send them, or by contacting us directly using the contact information below.

Apart from this, the personal information we collect for the purposes of your application will not be disclosed to any third party, unless we are required to do so due to any legal or regulatory obligation.

In general, the personal information that we collect from you will be stored at a destination within the UK or European Economic Area. Please note that we cannot guarantee the security of personal information transmitted via the internet.

LAWFUL PROCESSING The General Data Protection Regulation (EU) 2016/679 ("GDPR") requires us to rely on one or more lawful grounds to process your personal information. For the purposes of this application, we consider the grounds listed below to be relevant:

(1) Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract.

So that we can provide you with the allotted shares in Ivy House in return for the share purchase price.

(2) Where necessary so that we can comply with a legal obligation to which we are subject.

For example, for anti-money laundering, accounting or auditing purposes (for example our annual return to the FCA), FCA inspections or so that we can register you on our internal register.

(3) Where there is a legitimate interest in us doing so.

The GDPR allows us to collect and process personal information if it is reasonably necessary to achieve our legitimate interests (as long as that processing is fair and balanced and does not unduly impact your rights).

In general, "legitimate interests" mean the interests of running Ivy House as a community benefit society. Where we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under applicable data protection/privacy laws. We will not use your

personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by applicable law).

5. Your rights

Once we have collected and as long as we continue to process your personal information, you have the following rights:

Right of access – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that information, provided we are satisfied that you are entitled to see the information requested and have successfully confirmed your identity. Right of erasure – you can ask us to delete your personal information in certain circumstances. Right of rectification – if you believe that our records of your personal information are inaccurate, you have the right to ask for those records to be updated. Right to restrict processing – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage. Right to object – you have the right to object to our processing of your personal information in certain circumstances including where we use it for direct marketing. Right to data portability – where we are processing your personal information (i) with your consent or (ii) because such processing is necessary for the performance of a contract, you may ask us to provide the personal information to you – or another service provider – in a machine-readable format. To exercise any of these rights, please send a description of the personal information in question using the contact details in section 9 below. Where we consider that the information you provide does not enable us to identify you or the personal information in question, we reserve the right to ask for (i) personal identification or (ii) further information.

Please note that you may only use/benefit from some of these rights in limited circumstances. For more information, we suggest that you consult guidance from the Information Commissioner's Office ("ICO") – or please contact us using the details in section 9 below.

You also have the right to make a complaint to the ICO about us or the way we have processed your personal information. For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-the-public/personal-information>.

6. For how long do you keep my personal information?

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed (i.e. to allow you to be a shareholder in the Ivy House or for associated record-keeping obligations), we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove it from our records at the relevant time.

7. Changes to the notice & your personal information

We keep this Notice under regular review and may update it from time to time. Where necessary we will notify you of changes to the Notice by email. The Notice was last updated on Feb 14, 2018.

You can check the personal information we hold about you, and ask us to update it where necessary, by emailing colin@ivyhousenunhead.com.

8. How to contact us

We are a Community Benefit Society registered in England and Wales. Our principal office is at 40 Stuart Road, SE15 3BE.

Please let us know if you have any questions or concerns about this Notice or the way in which your personal information is processed by contacting us at the following channels:

Email: colin@ivyhousenunhead.com

Telephone: 0207 277 8233

By post: Ivy House Community Pub Limited, 40 Stuart Road, London SE15 3BE.