Privacy Policy

1. Our Commitment to Privacy

Somerset White LLC is committed to protecting the privacy of the personal information it collects and maintains about you.

This privacy policy ("Privacy Policy") sets out how Somerset White LLC ("Somerset White", "we", "us" or "our") collects, uses, discloses, and safeguards personal information about individuals identified in Section 2 below. If you do not agree to this Privacy Policy, you may not use the Website or participate in the programs and services of Somerset White (the "Services").

2. Scope of this Privacy Policy

This Privacy Policy explains how we collect and process information about you if you are:

- **A Website Visitor** that is using our website www.somersetwhite.com ("Website").
- **A Member** who has registered with us to receive our lifestyle management Services on an ongoing membership basis or is enquiring about these Services.
- **A Client** who is not a Member, but that we provide event organization, travel planning or recruitment Services to, or is enquiring about these Services.
- Part of a **Member or Client's family or household**.
- A point of contact within our **Supplier and Partner** organizations.
- A **Candidate** that wishes to work for a Member or Client, who we provide our recruitment Services to.
- A member of **Staff,** a Candidate who is successfully appointed as a member of our Client's or Member's household staff.

3. Changes to our Privacy Policy

From time to time, we may change this Privacy Policy to accommodate new technologies, industry practices, regulatory requirements, or for other purposes. We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on the Website or through the Services, or by other means, consistent with applicable law. Your continued use of the Website or Services following such notice constitutes your acceptance of such changes. If you do not accept such changes, we ask that you not access or use the Website or Services.

4. Information Collected

Personal Data means any information about an individual from which they can be identified whether directly or indirectly.

Our predominant purpose for collecting Personal Data about the categories of individual listed above is to provide lifestyle management Services to our Members and Clients. This will include event organization, travel planning and recruitment Services.

We collect Personal Data about you in different ways, including:

- **Direct interactions.** You may give us your Personal Data when you access our Website, contact us for any reason, fill in our membership profile form, send us feedback or complete a survey that we provide to you.
- **Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies. We may also collect Technical Data about your equipment, browsing actions and patterns if you use our travel itineraries app.
- **Publicly available sources.** For example, we may collect Personal Data about our Members and Clients from Companies House or from press articles. We may also collect Personal Data about Candidates from social media searches.
- **Third parties.**
    - We may collect Personal Data about Members and Clients from other members of their family or household, for example if our point of contact is a chief of staff. Additionally, we may collect Personal Data about a Member or Client's family or household from another member of that family or household, for example if making travel arrangements or providing lifestyle management Services for the benefit of the wider family or household.
    - We also collect Personal Data about Members and Clients from our third-party anti-money laundering check providers from time to time.
    - If you are a Candidate, we will also collect Personal Data about you from our third-party background check providers in order to provide recruitment Services to our Member or Client.

The Personal Data we collect about you depends on how you engage with us.

If you are a Website Visitor, the Personal Data that we will collect about you will largely depend on what information you choose to send us when contacting one of our enquiry email addresses. This may include the following categories of Personal Data:

- **Identity Data -** full name, marital status, title.
- **Contact Data -** address, email address and telephone number(s).
- **Technical Data -** internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.
- **Usage Data –** data about how you use our Website or Services, including survey responses.
- **Marketing and Communications Data -** your preferences in receiving marketing from us and your communication preferences.

If you are a Member or a Client, we may collect and use the following data about you, as necessary to provide our Services to you:

- **Identity Data -** full name, marital status, title, date of birth, gender, passport details and driving license details.
- **Contact Data –** residential address, email address and telephone number(s).
- **Technical Data -** your login data, time zone setting and location, operating system and platform and other technology on the devices you use to access our travel itineraries app.
- **Availability Data –** details about your schedule and availability.
- **Transaction Data -** details about payments to and from you and other details of Services you have purchased from us.
- **Financial –** bank account or payment card details.
- **Profile Data –** requests for Services made by you, your interests and preferences (for example, we may keep records of which restaurants you have chosen in the past to provide a more helpful shortlist of restaurants when we work for you in the future).
- **Usage Data –** any survey responses you may provide to us from time to time.
- **Marketing and Communications Data -** your preferences in receiving marketing from us and your communication preferences.
- **Special Category Data -** nationality, ethnicity and information about relevant health issues and disabilities, that you may choose to disclose to us (for example so that we can help make reasonable adjustments for travel bookings).

If you are part of a Member or Client's family or household, we may collect and use the following data about you, as necessary to provide our Services for the benefit of your family or household. This may include making bookings or travel arrangements for you:

- **Identity Data -** full name, marital status, title, date of birth, gender, passport details and driving license details.
- **Contact Data –** residential address, email address and telephone number(s).
- **Availability Data –** details about your schedule and availability.
- **Profile Data –** requests for Services made by you, your interests and preferences (for example, we may keep records of which restaurants you have chosen in the past to provide a more helpful shortlist of restaurants when we work for you in the future).
- **Special Category Data -** nationality, ethnicity and information about relevant health issues and disabilities, that you may choose to disclose to us (for example so that we can help make reasonable adjustments for travel bookings).

If you are a point of contact within our Supplier and Partner organizations, we may collect and use the following data about you:

- **Identity Data** - full name.
- **Contact Data -** address, email address and telephone number(s).

If you are a Candidate or a member of Staff, we may collect and use the following data about you as necessary to provide our recruitment Services:

- **Identity Data** – full name, marital status, title, date of birth, gender, right to work information, passport and driving license details.
- **Contact Data** – address, email address and telephone number(s).
- **Availability Data** – details about your schedule and availability.
- **Transaction Data** – details about salary payments to you.
- **Profile Data** – your CV, any additional information regarding your skill set for the role, your experience, and your training background and your headshot if you choose to provide this.
- **Usage Data** - any survey responses you may provide to us from time to time.
- **Special Category Data** – nationality, ethnicity and information about relevant health issues and disabilities, that you may choose to disclose to us.
- **Criminal Conviction Data** – DBS check results where these are required by a particular Client/Member and you consent to these checks being completed. In these circumstances we receive the results from you on a voluntary basis and share them with the relevant Client/Member with your explicit consent.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and your communication preferences.

We need some of this Personal Data to provide you with our Services. If you do not provide Personal Data we ask for, it may delay or prevent us from providing our Services to you.

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.

5. Personal Data Relating to Third Parties

Please ensure that any Personal Data you supply to us which relates to third parties, including family members, is provided to us with their consent and knowledge of our proposed use of their Personal Data. We shall be entitled to rely upon the accuracy of such Personal Data and to act on the assumption that it has been disclosed to us with their consent.

6. How we Store and Use your Personal Data

You agree to the storage of Personal Data in our databases and on our computers and in our WhatsApp conversations (when you have provided Personal Data to us in this way). Personal Data will also be stored on our secure servers, cloud storage (Azure), Last Pass and on Office 365. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances and for the following purposes:

- Where needed to perform the contract we are about to enter into or have entered into with you or to otherwise provide Services to you or others (e.g. household members).
- Where it is necessary to fulfil a request, you have made to us in conformity with applicable law.
- Where we need to comply with a legal obligation, government inquiry, or legal process.
- When we are entering into a merger or other business combination.
- To operate, perform, develop, and improve the Website and the Services.
- When the use of the Personal Data is reasonably necessary to our legitimate business interests, such as managing our relationship with you.

Transactional purposes

We will need to use your Personal Data in order to carry out our obligations arising from any contracts entered into between you and us, or at your request, before we enter into a contract.

This will include using your Personal Data in order to respond to your queries and requests, to provide and to process payments.

Personalizing your Services

We will use the Personal Data that we hold in order to learn more about your personal preferences and therefore improve the Services we provide to you. For example, we may use records of which restaurants you have chosen in the past to provide a more helpful shortlist of restaurants when we work for you in the future.

Marketing communications

Where you have expressly consented to us doing so in accordance with applicable law, we may contact you for marketing purposes electronically (e.g. email, MMS, SMS or through social media) or by telephone. We may also contact you by post from time to time, unless you have told us that you do not want to receive these communications. When we send marketing communications to you by email, you will be given an opportunity to unsubscribe from such communications. You may also opt out of receiving marketing communications from us at any time by informing us at the following email address: privacypolicy@somersetwhite.com.

Marketing analysis

We may use your Personal Data for the legitimate interest of internal marketing analysis, for example, to assess service use trends or to measure the amount of traffic to our website. We may occasionally ask you to take part in a survey, the results of which will be used for internal marketing analysis. Where required by law to obtain your consent before utilizing your Personal Data, we shall do so.

We may also use your Personal Data for other purposes that you expressly consent to from time to time.

7. Disclosing to Third Parties

We may share anonymous information in accordance with our practices. We will not share your personal information with another entity except in limited circumstances, including:

- When you allow or direct us to share your personal information with another person or company.
- When reasonably necessary to offer or perform the Services, such as to our service providers and vendors, which may include but are not limited to email and document management providers, payment processors, travel services, recruitment agencies, and event organizations.
- Where we are legally required to do so or where we need the assistance of third parties' data processors, acting under our instructions, for example, to conduct anti-fraud or money-laundering checks.
- Where we may provide your Personal Data to a third party in connection with the sale of our company or business, other corporate event, or in the unlikely event of a bankruptcy; to enforce any terms of use or other contract you have with us; to ensure the safety and security of our users and third parties; to protect our rights and property and the rights and property of our users and third parties; to comply with legal process, or in other cases if we believe in good faith that disclosure is required by law.

We always endeavor to ensure that Personal Data is only disclosed to those third parties for lawful purposes in accordance with this Privacy Policy.

We request 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.

8. International Transfers

Personal Data that we collect may be processed by staff who are based in our US or UK offices as referred to on this Website. Given the international nature of our organization, by providing us with Personal Data, you agree that we may share Personal Data between our US and UK offices in accordance with this Privacy Policy, although we will only do so in accordance with applicable law.

We may disclose your Personal Data to suppliers and other third parties who may assist us in providing Services to you. Such third parties may be engaged in, amongst other things, the processing of your request for Services and payment. You agree that we may share Personal Data with these third parties in accordance with this Privacy Policy, although we will only do so in accordance with applicable law.

We have contracted with a third-party provider, LastPass US LP (known as "Last Pass") to provide a password management / information auto-fill tool, and so your Personal Data may be hosted by Last Pass in the US. Last Pass is signed up to the EU-US Data Privacy Framework which means that it is committed to protecting Personal Data to standards that are equivalent to EU legal principles for data protection, and we shall aim to ensure that your data is treated to the same security standards. For more information about this, please see - https://www.lastpass.com/trust-center/privacy.

We have also contracted with a third-party provider, Microsoft Corporation, to provide cloud-based storage via its Azure service. Microsoft Corporation is also signed up to the EU-US Data Privacy Framework.

In all cases, Personal Data will only be disclosed to staff and third parties who share our commitment to treating Personal Data responsibly.

9. Retention Period

We will retain certain Personal Data in respect of financial transactions for as long as the law requires us to for tax or accounting purposes (which may be up to 6 years after a particular financial transaction). In respect of the holding of Personal Data for direct marketing purposes, we will retain this in line with applicable law and guidance of competent regulatory authorities. We will delete Personal Data that is no longer needed by Somerset White or will mark your data as 'do not contact' if you tell us you do not wish to be contacted in the future.

10. Security to Protect Personal Data

We employ appropriate technical and organizational security measures to protect your Personal Data from being accessed by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. We also endeavor to take all reasonable steps to protect Personal Data from external threats. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including Personal Data) disclosed or transmitted over public networks.

11. Your Rights

In accordance with your legal rights under applicable law, you can request information about the Personal Data that we hold about you, what we use that Personal Data for and who it may be disclosed to.

You can also request that we:

- Correct Personal Data that we hold about you which is inaccurate or incomplete.
- Erase your Personal Data without undue delay.
- No longer use your Personal Data for marketing purposes (please see the Marketing communications section above).
- Transfer your Personal Data to another organization, for example, an alternative provider.

All of these requests may be forwarded to a third-party provider who is involved in the processing of your Personal Data.

If you would like to exercise any of the rights set out above, please write to our data protection contact at the email address in the 'Contact' section below. Where applicable law allows, we may request a fee to cover our administrative expenses in responding and may also require further information to verify your identity or locate the specific information you seek before we can respond in full.

12. Contact

If you have further queries or requests relating to how we use Personal Data, please contact us at privacypolicy@somersetwhite.com, or by post at our office at 580 Broadway, Suite 303, New York, New York 10012, Attn: Data Privacy.

13. Third Party Sites and Services

We may include or offer links to certain external resources, including websites, apps, or platforms unaffiliated with or not controlled by us ("External Sites"). We may also use certain services to communicate with you (such as WhatsApp or a similar service) ("External Services"). This Privacy Policy does not apply to External Sites and External Services, and we are not responsible for the privacy policies or practices of External Sites, External Services, or your use of them. Please read the policies and practices of External Sites and External Services before accessing or using them.

14. Governing Law

This Privacy Policy is governed by the laws of the State of New York. Subject to any mandatory legal rights you have under applicable law in another territory that cannot be contractually limited or excluded, you agree that any dispute relating to the subject matter, interpretation, application, or enforcement of this Privacy Policy is subject to the exclusive jurisdiction of the Supreme or Federal Courts of the State of New York, located in the County of New York.