

# The Hope Lease Limited (Trading as KOKO and The House of KOKO)

## Privacy Policy for End Customers

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### 1. Introduction

The Hope Lease Limited (“KOKO”, “we”, “our”) is committed to protecting the privacy and security of the personal data we collect about end customers and users of our services (“you/your”).

The purpose of this privacy notice is to explain what personal data we collect about you when you interact with us, whether as a customer, member, membership applicant, guest, visitor, user or performer of our websites, applications, services or facilities. When we do this, we are the controller.

Our registered office address is The Hope Lease Limited, 3<sup>rd</sup> Floor, Denmoss House, 7 Greenland Street, London, NW1 0ND. Our trading address and location of our music venue known as KOKO (the “Theatre”) is 1A Camden High Street London and members club known as the House of KOKO (the “House”) is 74 Crowndale Road, London.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at [dataprotection@koko.co.uk](mailto:dataprotection@koko.co.uk).

### 2. What is personal data?

‘Personal data’ is any information from which you can be identified, either directly or indirectly. For example, your name or an online identifier.

‘Special category personal data’ is more sensitive personal data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

### **3. Personal data we collect about you, our purposes and lawful bases**

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to goods and services we offer to individuals and our wider operations in the European Economic Area (EEA). The personal data we collect differs depending upon your interaction with us, please see the table below to learn more about the personal data we collect, the purposes for doing so and the lawful bases we do this under.

Generally, we process your personal data to comply with applicable law, regulations, guidelines, licencing conditions and instructions (including from instructions issued by local licensing officers and the police) in relation to the safe management and operation of the Theatre and House.

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Please view our separate notices for more information on the following:

- Job vacancies – for more information on how we process your personal data as part of an application please see our job applicant privacy notice.
- We use cookies to monitor the use of our website, for more information on the cookies we use please see our cookies notice.

Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis
Guests or visitor to our premises  <i>This includes, the Theatre, the House of KOKO, Café KOKO, KOKO Electronic</i>	CCTV recordings monitoring the interior and exterior of the Theatre and House Premises.	For the purposes of crime prevention and public safety.	It is in our legitimate interests to operate CCTV surveillance and keep a record of incidents to ensure: <ul style="list-style-type: none"> <li>- the Theatre and House rules and conditions are enforced,</li> <li>- the safety of our staff and visitors,</li> <li>- that we fully comply with health and safety regulations,</li> <li>- the security of our premises, and</li> <li>- that we can assist with the investigation of crime.</li> </ul> Where special category data is processed, we will rely upon our legal obligation under the Health & Safety at Work Act 1974 and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. We are also required to keep a record of incidents under the conditions of our premises licence.  In certain situations, we may also process your personal data under the lawful basis of protecting your vital interests.
	Record of breaches of rules/incident recording.	We ensure records are kept of incidents to ensure that we can maintain and promote a safe environment for all.	
	Your age, or a copy of your ID.	We must verify your age and/or your ID.	

<p>Purchase information, such as name, email address, postal address and telephone number.</p>	<p>Where you attend one of our venues, purchase tickets through our website or through our event partners we may store your purchase information and a record of your purchases.</p> <p>Your personal data may be shared with third-party service providers, and analysed in an anonymised format to gain insights and conduct analytics.</p>	<p>We collect this information in order to perform a contract with you. For example, to enable you to purchase a ticket for an event or to be admitted an event.</p> <p>It is in our legitimate interests to provide you with a more personalised experience.</p>
<p>Vehicle registration details to facilitate access.</p>	<p>Where you require VIP, backstage or loading/unloading access we require your vehicle registration to facilitate this.</p>	<p>Where we process your vehicle registration to collect or drop-off deliveries, we process this for the performance of a contract.</p> <p>Where you require VIP access, we have a legitimate interest to collect this information to provide you with a personalised service.</p>
<p>Your name and email address</p>	<p>Where you connect to our Wi-Fi Network.</p> <p>We may also send you information relating to your visit.</p>	<p>We rely upon your consent to grant you access to our Wi-Fi.</p> <p>Legitimate interest - it is in our legitimate interests to reach out to you regarding your experience and inform you of other relevant events and information.</p>
<p>Images of you from photographs and video taken at our venues and at events we organise</p>	<p>We collect this in order to create promotional material and provide individuals with photos of their time at KOKO.</p>	<p>It is in our legitimate interests to process this information to promote our events.</p>
		<p>Consent</p>

Membership applicant	Name, date of birth, gender identity, pronouns, nationality, email address, mobile number, postal address, social media links to support your application, a copy of your ID, job title, company, headshot photo, billing information and any other information and opinions you provide within the free text sections of the application.	To help us determine whether you meet our membership criteria.  To allow us to enter into a contract with you should your application be successful (billing information).	This is necessary for the potential provision and performance of contract.
	Industry, Instagram handle, and any other information and opinions you provide within your application	To allow you to provide supporting information as part of your membership application.	It is in our legitimate interests to assess your suitability for the membership and gain understanding of your application.
Members	Name, date of birth, gender identity, pronouns, nationality, email address, mobile number, social media links to support your application, a copy of your ID, job title, company, photo, dietary information and any other information you provide within your application.	To allow us to provide you with membership services.  Your personal data may be shared with third-party service providers, and analysed in an anonymised format to gain insights and conduct analytics.	Performance of a Contract  Explicit consent (dietary)  It is in our legitimate interests to provide you with a more personalised experience.
Suppliers, Performers, Photographers	In order to contract with you we may process the following categories of personal data: Name (of yourself,	We process this information in order to enter into a contract with you.	This information is processed under the lawful basis of performance of contract. Where we collect information such as passport details this is to make travel arrangements.

<p><i>And other parties we contract the services of</i></p>	<p>company, band, agents, managers, associates etc.) phone number, email address, bank details, ID or other documents required to book travel, any accessibility requirements or dietary needs and any other information required to enter into a contract with you.</p>		<p>Accessibility and dietary information are collected under the lawful basis of explicit consent.</p>
<p>Website visitor &amp; general interactions with us</p>	<p>General enquiries - name email phone and other details contained within your enquiry.</p> <p>Performing enquiries – band/artist name, manager, promoter or booking agent (any other details contained within your enquiry)</p> <p>Domain name and IP address, operating system, browser, version and the name of the website that you visited prior to our website (for</p>	<p>We process your data to respond to your queries.</p> <p>We collect information on our website for the purposes of monitoring and improvement.</p>	<p>It is in our legitimate interests to respond to your enquiry.</p> <p>We have a legitimate interest to improve the functionality, security and performance of our website. Collecting this information will allow us to provide you with a more customised user experience.</p>

	example if you came to us through a search engine).		
Newsletter subscribers and competition entrants	Your name, email address and postcode.	To keep you informed of our events, Club activities and offers.  To inform you whether you have been successful in our competitions.	Consent
	Name, relevant event attended, email address, phone number	To keep you informed of our events, Club activities and offers.	(Third party) consent
Promoter/co-promoter newsletter	Name, relevant event attended, email address, phone number	To receive marketing from promoters/co-promoters.	Consent

## 4. How we collect your personal data

We collect most of this personal data directly from you—in person, by telephone, text, WhatsApp or email and/or via our website. However, we may also collect information:

From ticketing agencies, reservation agents and third-party suppliers where they provide us with your personal data when you book one of our events through their platform.

We may also receive information about you from, licensing authorities, the police or organisations such as PubWatch as part of our door security and admission policy.

## 5. Sharing your personal data

We may disclose your personal data to our third-party service providers, agents, subcontractors, and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to host our servers).

We may share your personal data with the promoters/co-promoters where you have consented to receiving marketing materials from them.

Please note that we may also reach out to you where we have been provided your data by the promoter/ co-promoter to promote our events where you have opted in to receiving marketing materials from us.

We may disclose your personal data to any member of our corporate group, which means our subsidiaries, our ultimate holding company, and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (where applicable).

KOKO uses Scannet to verify identification in compliance with the Licensing Act 2003, helping ensure public safety, prevent underage drinking, and maintain a secure environment. Your personal data is shared with Scannet and other venues using the system, as well as law enforcement or local authorities if necessary, to prevent crime and disorder.

We may also disclose your personal data to third parties:

- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if substantially or all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal, regulatory or licencing obligation, or in order to enforce or apply our Club rules and policies, membership terms and conditions or website terms and conditions; or
- to protect our rights, property, or safety or that of our affiliated entities and our users and any third party we interact with to provide our products and services; or
- in relation to selected third parties only, only to the extent that you have consented to such selected third parties notifying you about certain goods or services, which may be of interest to you.

It is important for us that you understand who your information may be shared with and the seriousness with which we take the confidentiality of your personal data. If you have questions about who we share your personal data with, we will be happy to tell you more.

Other than as set out above, and save insofar as is necessary in order for us to carry out our obligations arising from any contracts entered into between you and us, we will not share your data with third parties unless we have procured your consent to do so.

## 6. International Transfers

When we collect your personal data, it may be processed outside the UK. This is because the organisations we use to provide our services to you are located in other countries.

We have taken appropriate steps to ensure that where personal data processed outside the UK, it has an essentially equivalent level of protection as it has within the UK. We do this by ensuring that:

- Your personal data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation);
- EU-U.S. Data Privacy Framework: For transfers to the United States, we may rely on organisations that have self-certified under the UK Extension to the EU-U.S. Data Privacy Framework; or
- We enter into either International Data Transfer Agreements (IDTAs) or Standard Contractual Clauses (SCCs) (with the UK Addendum) with the receiving organisations and ensure that supplementary measures are also applied, where necessary.

## 7. How long we keep your personal data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

## 8. Your rights

You have certain rights in relation to the processing of your personal data, including to:

- **Request access** to your personal data (commonly known as a “Subject Access Request”). This enables you to receive a copy of the personal data we hold about you.

- **Request rectification** of the personal data 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 data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data 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. If you object to us using your personal data for marketing purposes we will stop sending you marketing material.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party (data portability).
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to make a complaint.** You have the right to complain directly with us if you believe that your personal data has been used, accessed, or processed in a manner that does not comply with the UK data protection laws. All complaints must be sent to [dataprotection@koko.co.uk](mailto:dataprotection@koko.co.uk).

#### Right to withdraw consent

In the circumstances where you may have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are permitted by law to do so.

#### How to exercise your rights

You will not usually need 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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. If you wish to exercise your rights, please contact us at [dataprotection@koko.co.uk](mailto:dataprotection@koko.co.uk).

## **9. How to complain**

If you are not satisfied with our response, or if you believe we have not handled your concerns appropriately, you also have the right to lodge a complaint with the UK supervisory authority, the Information Commissioner's Office (ICO). [How to contact us](#)

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, then please address your correspondence to:

The Hope Lease Limited, 3<sup>rd</sup> Floor, Denmoss House, 7 Greenland Street, London, NW1 0ND  
Alternatively, you can email us at [dataprotection@koko.co.uk](mailto:dataprotection@koko.co.uk)