



AIM LIFESTYLE

AIM LIFESTYLE APP

PRIVACY POLICY

1. WHAT'S IN THIS POLICY?

Aim Events is committed to protecting your privacy and ensuring that your personal data is protected at all times. The AIM Lifestyle app is a part of AIM Events Limited.

This policy (and any other documents referred to in it) (collectively referred to as “**the Policy**”) sets out the basis upon which any personal data we collect from you, display about you or that you provide to us via the AIM Lifestyle App (“**the App**”), will be processed by us.

Reference to “**you/your**” in the Policy means any natural person who downloads, uses and/or engages with the App.

Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it. By downloading and using the App you will be deemed to have accepted the practices described in the Policy.

2. WHO WE ARE AND HOW TO CONTACT US

Aim Events Limited is registered in Ireland under company number 631717 and has its registered office at Block 3, Harcourt Centre, Harcourt Road, Dublin 2, D02 A339 (“**Aim Events**”).

Aim Events is subject to the requirements of the General Data Protection Regulation 2016/679 (“**GDPR**”) as well as those national and local laws and regulations in the jurisdictions within which it operates.

For the purposes of the GDPR, Aim Events acts as data controller in respect of personal data processed via the App.

Any data protection related queries can be sent to aimlifestyle@aimevents.co.

3. INFORMATION WE COLLECT FROM YOU

For the purposes of this clause, where we receive personal data about you from a third party, we presume that party is lawfully processing your data in line data protection law and Aim Events accepts no responsibility for non-compliance with data protection law by any such third party.

We will collect and process the following personal data about you:

3.1. Information collected via the App

- 3.1.1. This is information about you that either you or a third party on your behalf provide to us through the App.

- 3.1.2. Ordinarily it includes information such as your name, contact details, professional details and other profile information you provide to us via the App. It may also include your financial information (if applicable), as well as your location information, where this is required for use of the Concierge service or where you permit the App to use your location services via your device settings.
- 3.1.3. Information you provide through online surveys and questionnaires, preference choices you make and information on your usage of the App including pages viewed, facilities used etc.
- 3.1.4. Personal information you provide to us in direct communications with us.

3.2. **Additional information we might collect about you via the App**

3.2.1 When you use the App we will automatically collect the following information:

- i. Information you provide through online surveys and questionnaires, preference choices you make and information on your usage of the App including pages viewed, facilities used etc.
- ii. We also monitor user/Member usage of the App and collect and process statistical information on a non-personally identifiable basis about users, their profile, preferences and use of the App. This includes the information which is otherwise personal data except that it is processed on an anonymous basis and cannot be linked to specific individuals or entities.
- iii. On an aggregated basis, we also collect anonymous data related to the pages, downloads and other content that is sampled, clicked on, streamed, searched for, transferred from and downloaded.
- iv. Cookies – please refer to our cookie policy here.

4. **PURPOSES FOR WHICH WE COLLECT YOUR INFORMATION**

- 4.1 Personal data collected via the App will be primarily used by Aim Events to carry out its obligations arising from the contract between it and its users/members to provide the services requested from us (please refer to our terms and conditions here (“**the Contract**”)).
- 4.2 We rely on our legitimate interests in promoting a high-end luxury lifestyle app to use your personal data to verify that you are a suitable user for the App and/or to ensure that only users to whom the App is aimed at are using it.
- 4.3 We will rely on your consent to process Cookies and also to provide you with additional information, services and features that you have requested from us which fall outside the Contract.
- 4.4 Aim Events has a legitimate interest in ensuring that no unlawful activity is taking place on the App and where such activity is suspected and/or has been reported, your personal data may be processed by Aim Events to investigate and deal with such matters. Your personal data may also be shared with our legal advisors, insurers and appropriate law enforcement agencies in such circumstances.
- 4.5 Aim Events also has a legitimate interest in pursuing and/or defending legal claims which may arise from time to time as a result of your use of the App. In such circumstances, your personal data may be shared with our legal advisors, insurers and/or any other party relevant in the context of dealing with such claim.
- 4.6 In limited circumstances your personal data may be processed to comply with a statutory and/or

legal obligation to which Aim Events is subject.

- 4.7 To fulfil our legitimate interest in providing a high-quality service for users/members, the information set out at clause 3.2.1. of the Policy will be processed for the following purposes:-
 - 4.7.1 to administer the App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - 4.7.2 to improve the App to ensure that content is presented in the most effective manner for you and for your electronic device;
 - 4.7.3 to allow you to participate in interactive features of our service, when you choose to do so;
 - 4.7.4 as part of our efforts to keep the App safe and secure;
 - 4.7.5 to measure or understand the effectiveness of any advertising we serve to you and others via the App, and to deliver relevant advertising to you.

5. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

- 5.1. For the purposes set out at clause 4 above, Aim Events may share personal information obtained via the App with third parties.
- 5.2. Such parties include, but are not limited to, our chosen service partners.
- 5.3. In certain circumstances, for the purposes outlined, it may be necessary to share the personal information you provide to us with non-partner third parties, including external advisers, consultants and/or third party service providers for example IT support companies, mailing companies and/or researchers who carry out projects for Aim Events or who are instructed on behalf of the Aim Events.
- 5.4. In those instances where we share your personal information with third parties, we will comply with any applicable privacy law requirements regarding data sharing and where necessary, we will put in place with such third parties written contracts to try and ensure that your personal information is not used for any reason other than for which it has been provided to that party by Aim Events and to generally ensure the protection and security of your personal information.
- 5.5. In certain circumstances Aim Events may be under a duty to disclose or share your personal data in order to comply with a legal or statutory obligation, or in order to enforce or apply our terms and conditions (the Contract) and other agreements; or to protect the rights, property, or safety of Aim Events, our members, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and the prevention of criminal activity.

6. HOW LONG DO WE RETAIN YOUR INFORMATION

- 6.1 Aim Events will generally only retain your personal data for as long as necessary to fulfil the purposes for which it was collected. This will be longer in some instances than others.
- 6.2 In some circumstances it may be necessary to retain your personal data for longer than the purpose for which it was collected for example to comply with any relevant legal requirement or where we believe it is necessary to retain the information for longer for example to allow us to defend an actual or anticipated legal claim.
- 6.3 We will securely delete your personal information when it is no longer required.

7. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA (“EEA”)

- 7.1 By signing up to and using the App, your personal data may be processed, either by Aim Events or its trusted third parties, outside of the EEA (to include the UK). Where your personal data is processed outside the EEA, information that we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by Aim Events staff operating outside the EEA who work for us or any of our agents, suppliers or product providers located outside the EEA.
- 7.2 Aim Events will ensure that any such processing takes place in accordance with one of the methodologies permissible by privacy law, such as, for example the adoption of Standard Contractual Clauses approved by the European Commission or the selection of transferees which operate in countries considered as safe by the European Commission pursuant to Article 45 of the GDPR.

8. SECURITY MEASURES ADOPTED BY AIM EVENTS

- 8.1 Aim Events is committed to ensuring appropriate security measures are in place to protect your personal data as required by relevant privacy laws. Although absolute security cannot be guaranteed (particularly from cyber-attacks), the App has in place a number of measures to protect your information. This includes:
- 8.1.1 Ensuring that measures such as password encryption and database encryption are in place;
- 8.1.2 Keeping your personal data on encrypted, limited access servers;
- 8.1.3 Wherever possible and applicable, Aim Events servers reside behind a corporate firewall that maintains controls on access to the system from both our internal network and the Internet. Access to your personal data is allowed only to our staff and third parties that require such access and we require our staff and such third parties to keep that information in confidence and to keep it secure. We require any third party that processes your personal data to maintain adequate technical and organisational measures to ensure the security of the information.

9. YOUR RIGHTS

- 9.1 Where you are subject to the protections of the GDPR/European data privacy laws, you have a number of general rights in relation to your personal information (subject to some limited exceptions), including:
- 9.1.1 The right to information about what data we hold about you;
- 9.1.2 The right to a copy of all data we hold about you either by way of a data access request or, in a machine-readable format, by way of a data portability request;
- 9.1.3 The right to object to our processing of your data;
- 9.1.4 The right to request that your personal information be erased or restricted from further use;
- 9.1.5 The right to correct amend or update information you have given us;
- 9.1.6 Where we process your personal data on the basis of your consent, the right to withdraw this consent at any time.
- 9.2 To exercise any of the above rights please email us at aimlifestyle@aimevents.co. Please note that whilst we will carefully assess every request we receive we may not always have to comply. When this happens, we will explain why.

10. QUERIES/COMPLAINTS

- 10.1 If you have any questions about the contents of the Policy or if you are not happy with the way in which Aim Events handle/have handled your personal data or have dealt with a rights request,

please contact us by email at aimlifestyle@aimevents.co.

- 10.2 You may also have a right to make a complaint to your national supervisory authority for data protection.

11. OTHER IMPORTANT INFORMATION

- 11.1 The App may contain links to and from websites of other parties. If you follow a link to any such website, please note that those websites should have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.
- 11.2 All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a username or password which enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 11.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data (as set out in clause 8 of this Policy), we cannot guarantee the security of your data and any transmission of your personal data via the App is at your own risk.

12. CHANGES TO THIS POLICY

- 12.1 Any changes we make to the Policy in the future will be posted on the App through the updating of the relevant links. Please check back frequently to see any updates or changes to the Policy.