

UHBA Ltd

Personal Data Protection Policy

This Data Protection Policy sets out the basis on which UHBA Ltd (“we”, “our”, “us”, “the Company”, “the Group”) collects, uses, shares, stores and otherwise processes personal data relating to members and guests of the Company in compliance with the UK General Data Protection Regulation, the Data Protection Act 2018, and, where applicable to guests or members based in the European Economic Area, the EU General Data Protection Regulation (together, “GDPR”).

This Data Protection Policy applies to all personal data, we process regardless of the media on which that data is stored or whether it relates to past or present members, guests, shareholders or any other Data Subject.

1. The Data Controller

UHBA Ltd (Company Number 16171352) of 128 City Road, London, United Kingdom, EC1V 2NX (“the Company”) is the data controller responsible for determining the purposes and means of processing your personal data (the “Controller”).

We are the Controller of all Personal Data relating to our Members and Guests, and of all Personal Data that we collect, use, disclose, store or otherwise Process in the course of our business and/or event for our own legitimate business purposes.

2. Application of this Protection Policy

This policy applies equally to: (a) **members** of the Group and its chapters; and (b) **guests and visitors** invited to or attending meetings, events or functions organised by or on behalf of the Company, whether in person or online.

3. Categories of Personal Data

The categories of personal data we may collect include, but not limited to the following:

- Identity and contact data: name, job title, employer, business name, email address, telephone number, postal address;
- Business data: sector, services offered, professional profile, LinkedIn or website details, referrals given and received;
- Meeting and event data: attendance records, visitor sign-in details, invitations accepted, dietary or accessibility requirements;
- Financial data: subscription and event payment details (processed via our payment provider; card details are not stored by us);
- Marketing preferences and communications history;
- Images or recordings taken at events, where notified in advance;
- Special category data (e.g. health or dietary information), only where you choose to provide it and only for the purpose disclosed at the time;

4. Sources of Personal Data

We may collect personal data as below:-

- I. directly from you, including through member or guest application forms, event booking forms, correspondence and attendance at event;
- II. from a member who refers and/or invites guest; or
- III. an event booking platform (e.g. Eventbrite) acting as our processor.

5. Purpose and lawful basis for processing

We will only process your personal data where we have a valid lawful basis to do so. The table below summarises our principal processing activities, including the invitation of members and guests to future meetings and events, and general administration of the Company.

Purpose	What this covers	Categories of data used	Lawful basis (UK GDPR / GDPR)
Membership and guest administration	Processing applications, maintaining the membership/guest register, subscriptions and renewals, chapter records	Identity, contact, business, payment details	Contract (Art. 6(1)(b)) / Legitimate interests (Art. 6(1)(f)) for guests
Invitations to meetings and future events	Sending invitations, agendas, joining instructions and reminders for meetings, chapter events, conferences and networking functions	Identity, contact details, attendance history	Legitimate interests (Art. 6(1)(f)) — running an effective networking group
Attendance, visitor and referral records	Recording attendance, guest sign-in, referrals passed between members, testimonials	Identity, business, referral/contact details of connections	Legitimate interests (Art. 6(1)(f)) / Contract for members
Member directory and networking materials	Producing member/guest lists, business profiles and directories shared within the group	Identity, business details, photograph (if provided)	Legitimate interests (Art. 6(1)(f)) / Consent for photographs where required
Marketing communications	Newsletters, updates on the group's activities and partner offers	Identity, contact details	Consent (Art. 6(1)(a)), withdrawable at any time
Payments and financial administration	Collecting subscriptions, event fees and processing refunds	Identity, payment/billing details	Contract (Art. 6(1)(b)) / Legal obligation (Art. 6(1)(c)) for tax records
Health, safety and site access	Managing venue access, dietary or accessibility requirements, incident records	Identity, health/dietary information (special category)	Vital interests / Explicit consent (Art. 9(2)(a)) where special category data is involved

Purpose	What this covers	Categories of data used	Lawful basis (UK GDPR / GDPR)
Compliance, safeguarding and dispute resolution	Investigating complaints, enforcing the group's code of conduct, legal claims	Identity, correspondence, conduct records	Legal obligation (Art. 6(1)(c)) / Legitimate interests (Art. 6(1)(f))

6. Disclosure of Personal Data

Generally, we are not allowed to share Personal Data with third parties unless the following circumstances: -

- Other members and chapter organisers of the Company, for networking, referrals and administration
- Guests, where a member has referred them, and referring members, where a guest attends
- Any parent network, franchisor or umbrella body under which the Company operates, where applicable
- Service providers acting as processors: venue operators, event booking and payment platforms, IT and email service providers, printers
- Professional advisers, insurers and regulators, and law enforcement or courts where required by law

We do not sell personal data to third parties. Where we engage third-party service providers to process personal data on our behalf, we will take appropriate steps to ensure that such providers process personal data in accordance with applicable data protection requirements.

7. International transfers

Where any of the above recipients are located outside the UK or EEA, we ensure an adequate level of protection through the UK International Data Transfer Agreement, EU Standard Contractual Clauses, or an applicable adequacy decision, before any transfer takes place.

8. Storage Limitation

Member and guest personal data must not be kept in an identifiable form for longer than is necessary for the purpose for which the data is processed.

We will maintain retention policies and procedures to ensure Personal Data is deleted after an appropriate time, unless a law requires that data to be kept for a minimum time.

9. Your Data Protection Rights

Under UK GDPR and GDPR you have the right to:

- Access — request a copy of the personal data we hold about you
- Rectification — ask us to correct inaccurate or incomplete data
- Erasure — ask us to delete your data where there is no lawful reason for us to keep it
- Restriction — ask us to limit how we use your data
- Portability — request your data in a portable, machine-readable format
- Objection — object to processing based on legitimate interests, including direct marketing

- Withdraw consent — at any time, without affecting processing carried out before withdrawal

To exercise any of these rights, contact us using the details in Section 1. We will respond within one month. You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** at ico.org.uk, or with your local supervisory authority if you are based in the EEA.

10. Automated decision-making

We do not carry out any processing based solely on automated decision-making, including profiling, which produces legal or similarly significant effects on members or guests.

11. Changes to this Policy

We keep this Data Protection Policy under regular review. This version was last updated on 30th August 2026.

This Data Protection Policy does not override any applicable national data privacy laws and regulations in United Kingdom.

The current version will always be available at www.uhba.co.uk and, where changes are material, we will notify members and guests directly.

12. Contact us

For any enquiries concerning the processing of your personal data, please contact:

Data Protection contact: Mr. Alex Wong – info@uhba.co.uk