



The Kent Privacy Policy

Effective January 1, 2024

We Respect Your Right to Privacy and Your Right to Control Your Personal Information

We at The Kent and The Kent Foundation want you to fully understand what information we collect from you and what we do with it. We also believe that you should have full control over your personal information (“Personal Information”). We do not disclose your information to anyone without your prior consent subject to the very narrow extent specified below. We do not sell your information. We never spam you. Our Privacy Policy applies to information we collect on our website www.thekent.social (“Site”) and at our club located 534 Cambie Street, Vancouver, BC, V6B 2N7 (“Club”). For purposes of The Kent Website Policies, the Site includes The Kent’s mobile applications for Members use. This Privacy Policy is updated at least every twelve months.

Our Privacy Policy is organized by questions our users may have:

What personal details do you need to know?

The minimum information we ask for your use of The Kent’s Site and Club as a Member are your name, street address, telephone number, email address, and the names of your guests. We also require a credit card to charge membership fees and any food, beverage, products, and services you purchase at The Kent (including any gratuity you pre-authorize). When you visit our website, our site analytics provider collects your IP address and browser (aggregated with our other users). Applicants to become a Member of the Club provide various personal information used to determine their qualifications for membership or membership pricing. As you use the Club, we keep a record of your reservations and purchases.

We use Sonato to assist with our reservations, reservation history, contact information, and payment details and we use Sonato Alliance for club reciprocity programs which share pre-authorized personal information with participating clubs. Their privacy policy is located at <https://sonato.com/privacy>. We use Agilysis Visual One for making reservations, reservation history, contact information, and payment details. Their privacy policy is located at <https://www.agilysys.com/en/privacy-policy/>. We use Docusign for the execution of our membership agreements which contain personal information. Their privacy policy is located at <https://www.docusign.com/privacy/>. Some archived physical membership agreements are retained in our secure filing.

Any personal information we gather from you or about you, including “sensitive personal information” as defined in the California Privacy Rights Act, will only be used for the business purposes enumerated in our Privacy Policy, and will only be disclosed to third parties to the very limited and narrow extent specified in our Privacy Policy, as necessary for The Kent to conduct

its business and provide the services reasonably expected by its members and guests. Your personal information, including sensitive personal information, will only be retained by us for the length of time specified in our Record Retention Policy and Schedule, which has been developed according to industry recommendations and best practices, as reviewed by our legal counsel.

When is my information given out?

Your personal details, other than your credit card number, are visible to The Kent's customer service and management personnel but not to other Members, guests or third parties, except as expressly stated herein. Your Club membership application materials are only visible to the Membership Committee, those who interview you for membership, and Club management. We do not store your credit card information, except for the last four digits of your card for ease of reference to your card on file. Your credit card information is maintained by a PCI compliant third-party processor. Your membership application records are stored on our secure servers with industry standard encryption.

If The Kent enters into a club reciprocity agreement with other private clubs in the Sonato network or elsewhere ("Network"), and if you request The Kent to facilitate your participation in that Network, The Kent will disclose to the Network administrator ("Administrator") your personal information, to the extent such information is required by the Administrator to process your application, registration and participation in the Network. You hereby consent to the transfer of such information to the Administrator.

Does The Kent sell my information to third parties?

We do not sell or lend any of your Personal Information to third parties without your prior consent except under the narrow guidelines stated in this Policy (for example disclosure to service providers working for us). We have not sold any Personal Information of any site User in the last twelve months. We do not sell Personal Information.

What do you use my personal details for?

- *Security* | We use your name and email address to securely confirm your identity.
- *Processing Transactions and Requests* | We use your Personal Information to process your applications, transactions, inquiries and requests; and communicate with you regarding the status of your applications, transactions, inquiries, and requests, such as reservations. We may communicate with you by email, postal mail, telephone, and/or text message. You will have the right to unsubscribe from our notification services at any time by contacting membership@thekent.social and asking to be deleted from our mailing and telephone lists.
- *Improving our Club and Site* | We may use your Personal Information, such as purchasing history, to enhance the services we offer at the Club, and to personalize your experience at the Club. We use your IP address and browser information (aggregated with other users) to improve our Site and better understand and serve our users.
- *Providing Information* | We may deliver information that is targeted to your interests, such as event offerings, administrative notices, product offerings, and communications relevant to your use of the Site and Club. By accepting The Kent Website Policies, you expressly agree to receive this information. You may make changes to your email notification preferences at any time by logging into your account on our site and clicking Member Dashboard and "Your Interests" (and de-selecting any unwanted communication

subjects) or by contacting membership@thekent.social and asking to be deleted from our mailing lists.

- *Using Service Providers* | We may use third parties that we refer to as internal service providers to facilitate or outsource one or more aspects of the business, product and service operations that we provide to you (e.g., credit card processing services, search technology, email support) and therefore we may provide some of your Personal Information directly to these internal service providers who follow industry standard security policies and are obliged to keep your information confidential.
- *Enabling You To Use Sonato and Sonato Alliance* | If you have expressed an interest in participating in Sonato Alliance to be able to visit other clubs in the Sonato Alliance network, The Kent will provide Sonato with your name and email address to set up your Sonato Alliance account.
- *Analytics* | The Kent uses the services of site analytics providers to analyze traffic and usage on the Site. In the course of providing services, such companies may have access to users' IP addresses on an aggregated basis. We do not make any effort to match IP addresses with other Personal Information.
- *Unintended Access* | Third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your Personal Information that they collect from the Site. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your Personal Information or private communications will always remain private. In case of a data breach, we would promptly notify our Members and website users as well as law enforcement.
- *Acquisition* | In the event of a merger or acquisition, your Personal Information may be transferred to the acquiring entity, and become subject to the acquirer's data practices.

What information do you obtain from hotel guests and how do you store and use it?

If you book a hotel room at The Kent, we ask for guest names, a telephone number, and an email address, in case we need to contact you. When you arrive at the hotel, we ask for identification to compare to the booking name. The identification is not copied or kept. Credit cards may be taken online or can be called in, where they are immediately entered into our PCI-compliant payment processor system where only the last 4 digits are stored on our servers. If a third party has agreed to pay for hotel charges, a Credit Card Authorization form must be printed, signed, and emailed to us, showing only the last four digits of the card, with the full number having to be called in and entered into our payment processor system. The Credit Card Authorization contains a name, signature, and authorized amount, plus the last four digits of the card. Copies of these Authorizations are stored on our secure servers. Physical registration cards containing contact information and signatures are kept in our locked files. Information obtained from hotel guests and payors are only used as necessary to secure, pay for, and provide guest services to the room(s). We do not use Personal Information given to the hotel for marketing or any other purposes and we do not disclose it to third parties, except to the very limited extent necessary for The Kent to conduct its hospitality business and provide the services reasonably expected by its guests. All information gathered by the hotel (except for full credit card information) is stored on our secure servers with industry-standard encryption.

We use Sonato to assist with our reservations, reservation history, contact information, and payment details. Their privacy policy is located at <https://sonato.com/privacy>. We use Agilysis Visual One for making reservations, reservation history, contact information, and payment details. Their privacy policy is located at <https://www.agilysys.com/en/privacy-policy/>. If any of our hotel guests wishes to exercise data privacy rights, The Kent will facilitate communication with our third party providers on behalf of our guest to exercise those rights.

Any personal information we gather from you or about you, including “sensitive personal information” as defined in the California Privacy Rights Act, will only be used for the business purposes enumerated in our Privacy Policy, and will only be disclosed to third parties to the very limited and narrow extent specified in our Privacy Policy, as necessary for The Kent to conduct its business and provide the services reasonably expected by its members and guests. Your personal information, including sensitive personal information, will only be retained by us for the length of time specified in our Record Retention Policy and Schedule, which has been developed according to industry recommendations and best practices, as reviewed by our legal counsel.

What Personal Information do you collect for Private Events at The Kent and how do you store and use that information?

When someone hosts an event at The Kent, we obtain the following information from the host: host Member name, company name, contact person name (e.g. event manager), contact phone, contact email, credit card of host, names of guests, food allergies or health/accommodation issues. Credit card information is entered directly into our PCI-compliant payment processor system and only the last four digits are stored on our secure servers along with other event information. Event information other than credit card numbers is entered into third party event management software

Any personal information we gather from our Private Event clients or about them, will only be used for the business purposes enumerated in our Privacy Policy, and will only be disclosed to third parties to the very limited and narrow extent specified in our Privacy Policy. Personal information, including sensitive personal information, will only be retained by us for the length of time specified in our Record Retention Policy and Schedule, which has been developed according to industry recommendations and best practices, as reviewed by our legal counsel.

Will I be added to any mailing lists?

We do not sell, rent or lend email addresses for any other purpose than in direct association with your use of the Club or the Site or as otherwise described in this privacy policy.

Do you send unsolicited emails?

The Kent will not send any unsolicited information, including email. You will, however, receive emails which form an essential part of the Club. You will have the right to unsubscribe from our email services at any time by contacting membership@thekent.social and asking to be deleted from our mailing lists.

What do you use cookies for? How can I opt out of them?

At the time you first enter our Site, you are given the opportunity to opt out of non-essential Cookies without affecting the functionality of our Site. Cookies are a standard internet technology, and many major websites use them to provide useful features for their users. Cookies allow us to store and retrieve login information on a user's system. They provide us with data that we can use to improve our service to you. If you so choose, you can save your login or password so you don't have to re-enter them each time you visit our site. Cookies themselves do not personally identify users, although they do identify a user's computer and user's preferences. Most browsers are initially set up to accept cookies. If you'd prefer, you can set yours to refuse cookies. However, you may not be able to take full advantage of our Site if you do so. You can control and/or delete cookies as you wish – for details, see aboutcookies.org. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

How will I be notified of changes?

We may amend The Kent Website Policies at any time by posting the amended terms on the Site. All amended terms shall automatically be effective immediately after posting on the Site.

How do I contact you?

If you have any questions about this Privacy Policy, the practices of this Site or your dealings with this Site, you can contact us via privacy@thekent.social or by writing to Customer Support, The Kent, 534 Cambie Street, Vancouver, BC, V6B 2N7.

How to Request a Copy of Your Personal Information | Please make your request to membership@thekent.social

Non-Discrimination | We do not discriminate against any site users who exercise their rights under the CCPA or other data privacy laws.

What would you do in case of a data breach?

If The Kent experienced a data breach, we would take emergency measures to secure our systems, then promptly notify all users of The Kent and The Kent Foundation that a data breach had occurred, providing all appropriate information to enable individuals to protect their privacy and any affected accounts, and providing contact information for questions. We would then remove further threats of breach to the best of our ability with the help of our professional and technical advisors. We would also notify all applicable law enforcement of the data breach and cooperate with any investigation.