LATCH

LIVE LIFE OFF-MENU.

PRIVACY POLICY

LATCH.GLOBAL · LAST UPDATED 20 OCTOBER 2026

1. WHO WE ARE

This policy explains how LATCH collects, uses and protects your personal information when you visit latch.global, contact us, become a member or use our services.

LATCH is a trading name of **AXS Global LTD**, a company registered in England and Wales. We are the controller of your personal information, which means we decide how and why it is used.

Contact us about privacy:

- Email: unlatched@latch.global (subject line "Privacy")

By using our website or services, you confirm you have read this policy. If you do not agree with it, please do not use our website or services.

2. WHAT WE COLLECT

We only collect what we need to look after you.

Information you give us, by enquiry form, email, phone, WhatsApp or in person:

- **Identity and contact details:** name, email address, phone number, postal address, company and job title.
- **Booking details:** dates, guest names and numbers, travel plans, passport or ID details where a supplier requires them, loyalty and membership numbers, and special requests.
- **Preferences:** favourite venues, seating, dietary preferences, celebrations and other details that help us personalise your experience.
- **Account and payment details:** membership type, billing information and payment history. Card payments are handled by our payment provider; we do not store full card numbers.
- **Communications:** messages and call notes between you and us.

Information about other people. If you make a request for someone else, such as your principal, family or guests, you confirm that you are allowed to share their details with us and that you have told them about this policy.

Information collected automatically when you use our website: IP address, browser and device type, pages viewed and how you arrived at the site, collected through cookies and similar technologies (see section 5).

Information from others: referrals from members or partners, and publicly available professional information, such as LinkedIn, when we are contacting businesses.

Sensitive information

Some requests involve health information, such as food allergies, dietary requirements linked to a medical condition, or accessibility needs. This is "special category" data under UK GDPR. We only record it with your explicit consent, only share it with the supplier who needs it to serve you safely, and you can withdraw consent at any time. We do not otherwise ask for special category data.

3. HOW WE USE IT

We only use your information when the law allows us to. The table shows what we do and the lawful basis for each.

What we do	Lawful basis
Answer enquiries and arrange bookings, travel and experiences you request	Contract, or steps before entering one
Manage Full Fat membership and Get Out of Jail requests, including billing and fee collection	Contract
Pass allergy, dietary or accessibility needs to a supplier	Explicit consent
Remember your preferences to personalise future requests	Legitimate interests (giving you a better service)
Send the Unlatched newsletter and offers	Consent, or legitimate interests for existing clients (soft opt-in)
Contact business decision-makers and their assistants about our services	Legitimate interests (growing our business), with an easy opt-out
Run, secure and improve our website, and prevent fraud and misuse	Legitimate interests
Keep accounting and tax records, and respond to lawful requests	Legal obligation
Establish, exercise or defend legal claims, and recover money owed	Legitimate interests (protecting our business)

Where we rely on legitimate interests, we have weighed our interests against your rights. You can object at any time (see section 7).

We do not sell your personal information, and we do not make decisions about you based solely on automated processing.

4. WHO WE SHARE IT WITH

We share only what each party needs to do their part.

- **Suppliers who deliver your request:** restaurants, private members' clubs, hotels, villa owners, airlines, private aviation and yacht operators, transfer companies, event and ticket providers, and similar businesses. Once they receive your details, they are responsible for them under their own privacy policies.
- **Our service providers**, who process data on our behalf under contract: website hosting (Wix), email and office software ([Google Workspace / Microsoft 365]), messaging (WhatsApp), newsletter delivery.
- **Professional advisers**, such as accountants, lawyers and insurers.
- **Authorities**, where the law requires it, or to protect the rights, property or safety of LATCH, our clients or others.
- **A buyer or successor**, if all or part of our business is sold, merged or restructured. Your information would continue to be protected under this policy.

International transfers. Some suppliers and service providers are based outside the UK, for example a hotel abroad or a US-based software provider. Sending booking details to an overseas supplier is necessary to deliver the service you asked for. With service providers, we rely on UK adequacy regulations or approved safeguards such as the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses.

5. MARKETING AND COOKIES

Unlatched and other updates. We send our newsletter, Unlatched, and occasional offers by email to people who have signed up. We also send them to existing clients about similar services, unless they have opted out. Every email has an unsubscribe link, or you can reply "unsubscribe" or message us. Opting out of marketing does not affect messages about bookings you have made.

Business outreach. We may contact people at businesses, including executive and personal assistants, about our services, using professional contact details. Each message tells you how to opt out, and we keep a suppression list so we do not contact you again.

Cookies. Our website uses cookies, which are small files stored on your device.

- **Essential cookies** make the site work and keep it secure. They do not need consent.
- **Analytics and marketing cookies** help us understand how visitors use the site and measure our campaigns. We only set them if you agree through our cookie banner.

You can change your choice at any time through the cookie settings link at the bottom of our website, or in your browser settings. Blocking some cookies may affect how the site works.

6. HOW LONG WE KEEP IT, HOW WE PROTECT IT, AND CHILDREN

Retention. We keep your information only as long as we need it:

Information	How long we keep it
Enquiries that do not become bookings	2 years from last contact
Client, membership and booking records	6 years after our relationship ends (for tax, accounting and legal claims)
Allergy, health and accessibility details	Until you withdraw consent or stop using our services
Marketing list	Until you unsubscribe; then a minimal record is kept so we do not contact you again
Website analytics	Up to 26 months

After that, we delete or anonymise it securely.

Security. We use appropriate technical and organisational measures to protect your information, including access controls, secure passwords and encrypted services. Only people who need your information can see it. No method of transmitting or storing data is completely secure, so we cannot guarantee absolute security. If a breach is likely to put your rights at risk, we will tell you and the ICO as the law requires.

Children. Our services are for adults. We do not knowingly collect information from anyone under 18, except where a parent or guardian gives it to us as part of a booking, such as a child's name on a family trip.

7. YOUR RIGHTS

Under UK data protection law, you have the right to:

- **Access** a copy of the personal information we hold about you.
- **Correct** information that is wrong or incomplete.
- **Erase** your information, in some circumstances.
- **Restrict** how we use your information, in some circumstances.
- **Object** to our use of your information based on legitimate interests, and to direct marketing at any time.
- **Port** information you gave us to another organisation, where technically possible.
- **Withdraw consent** at any time, where we rely on consent. This does not affect anything we did before you withdrew it.

To use any of these rights, contact us using the details in section 1. We may need to confirm your identity first. We will reply within one month, and usually free of charge. Some rights have limits; for example, we may need to keep records for legal or tax reasons. If so, we will explain why.

8. THIRD PARTIES, YOUR RESPONSIBILITIES AND OUR LIABILITY

We arrange; suppliers deliver. LATCH arranges services provided by independent third parties. When we pass your details to a restaurant, club, hotel, airline or other supplier so they can serve you, that supplier becomes responsible for your information under its own privacy policy and terms. We choose suppliers with care, but we are not responsible for how independent suppliers collect, use or protect your information.

Third-party websites and platforms. Our website may link to other websites and social media, such as LinkedIn and Instagram. If you contact us on WhatsApp or social media, those platforms also process your messages under their own terms. We are not responsible for the content or privacy practices of third-party websites and platforms. Please read their policies.

Your responsibilities. When you share information with us, you agree that:

- the information is accurate and up to date, and you will tell us if it changes;
- if you give us details about anyone else, you have their permission and have made them aware of this policy;
- you will not send us information you are not entitled to share; and
- you will keep your own devices, email and messaging accounts secure.

We are not responsible for any loss caused by inaccurate information you give us, or by unauthorised access to your own devices or accounts.

Limits of our liability. To the extent permitted by law, LATCH is not liable for any indirect or consequential loss arising from your use of our website or from the acts or omissions of third-party suppliers or platforms. Nothing in this policy limits or excludes any liability that cannot be limited or excluded by law, including your rights under UK data protection law.

Our right to protect LATCH. We may use and disclose information where reasonably necessary to enforce our terms, collect fees owed, prevent fraud or misuse of our services, or protect the rights, property and safety of LATCH, our team, our clients and our suppliers.

9. CHANGES TO THIS POLICY

We may update this policy from time to time. The latest version will always be on this page, with the date it was last updated. If we make significant changes, we will tell clients by email.

This policy is governed by the laws of England and Wales.