

PRIVACY POLICY of THE CIRCLE AGENCY

Last updated: October 2019

INTRODUCTION

Circle Agency is committed to ensuring that your privacy and personal data are protected. This Privacy Policy, together with our terms of use, sets out how Circle Agency uses and protects any personal data that you give us, including when you visit our website, use one of our applications (app), register as a Circle Agency client or at a live event that we manage.

By visiting this website or using one of our applications, you are accepting and consenting to the practises described in this policy. You can withdraw consent at any time by writing to us at the address below.

Circle Agency may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is compliant with the GDPR (EU) 2016/679 and the Data Protection Act 2018.

DATA CONTROLLER

Circle Agency Limited is the controller and responsible for the processing of your data in the United Kingdom.

WHAT PERSONAL DATA DO WE COLLECT?

We may collect, use, store and transfer your “personal data”. This can include:

- Identity Data such as name, usernames, marital status, job title, DOB and images
- Demographic Data such as preferences and interests
- Contact Data such as email address or telephone number
- Financial Data such as bank account or payment card details
- Technical Data such as IP address, login data, browser type, location, statistical or demographic data
- Usage Data such as information about how you use our website, products and services
- Marketing and Communications Data including your preferences regarding receiving marketing materials from us and/or our third parties or other information relevant to customer surveys or offers.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct Interactions
You may give us your identity and contact data by filling in forms (by paper or electronically) or by corresponding with us by post, phone, email or otherwise. This includes data you provide when you

apply for our products or services (or those of our clients/third parties), when you enter or apply for tickets at an event, when you enter a competition, promotion or survey or when you give us some feedback.

- Automated technologies or interactions - as you interact with our website we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our Cookie Policy for more detail.
- Third parties of public sources
We may receive data about you from third parties and public sources, including our clients, our suppliers, analytics providers, advertising networks or search information providers.

WHAT WE DO WITH YOUR PERSONAL DATA?

We use your personal data to better understand your needs and provide you with a better service, and in particular for the following reasons:

- to perform a contract, we have with you and provide our services
- to improve our services and to customise our services, website or app according to your interest
- to provide research and insights services for ourselves or to our clients, including feedback on live events, responses to marketing strategies, the public's interest in activities;
- to send you promotional materials or newsletters about us or our clients (where you have opted in to such communications)

We may share your information with selected third parties, including: clients, business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you. We will get your express opt-in consent before we share your personal data with any company outside Circle Agency Limited for marketing purposes.

See also "International Transfers".

Purposes for which we will use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract, we are about to enter into or have entered into with you.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where we need to comply with a legal or regulatory obligation.

The table below explains what we use (process) your personal information for and our reasons for doing so:

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To register you as a new customer	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of contract with you.
To process and delivery your order including: <ul style="list-style-type: none"> • Manage payments, fees & charges. • Collect ad recover money owed to us. 	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Marketing and Communication 	<ul style="list-style-type: none"> • Performance of contract with you. • Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to develop our products/services and grow our business)
Marketing our services to: <ul style="list-style-type: none"> • existing and former customers; • third parties who have 	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Necessary for our legitimate interests or those of a third party, i.e. to promote our business

<p>previously expressed an interest in our services;</p> <ul style="list-style-type: none"> • third parties with whom we have had no previous dealings. For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers 		<p>to existing and former customers.</p>
<p>Photographs or footage taken at Circle Agency or our client events.</p>	<ul style="list-style-type: none"> • Identity 	<p>For generic images or footage of crowds/fans taken at our events or those events of our client necessary for our legitimate interests or those of a third-party client, i.e. to promote our events or events of our client.</p> <p>For specific images of you or your children only we will obtain your explicit consent to use such images.</p>

HOW LONG WE HOLD YOUR DATA

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at data@circleagency.co.uk

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes and for the purposes of any contractual claim.

INTERNATIONAL TRANSFERS

From time to time we may share your personal data outside of the European Economic Area (EEA). This may be in order to share data with our clients, business partners, suppliers or subcontractors, who are based outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

SECURITY + DISCLOSURE

We are committed to ensuring that your information is secure and is not lost, used or accessed in an unauthorised way. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

LINKS TO OTHER WEBSITES

Our website or app may contain links to other websites of interest. However, once you have used these links to leave our site or app, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

TWITTER

A number of our applications utilise Twitter and/ or other website's APIs (Application Program Interfaces) in order to display tweets and/or other pieces of information or data acquired from third party websites. From time to time we will store this data for use in one of our apps. We will treat this data in exactly the same way as we do other data referred to in this privacy policy.

CONTROLLING YOUR PERSONAL INFORMATION

You may choose to restrict the collection or use of your personal information in the following ways:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have 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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

CONTACT US

If you have previously agreed to us using your personal information, you may change your mind at any time by writing to or emailing us at data@circleagency.co.uk

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

You may request details of personal information which we hold about you under the requirements of GDPR. If you would like a copy of the information held on you please write to:

Attn: Data Controller

Circle Agency Limited

Unit 10, The Aquarium, King Street, Reading, RG1 2AN

data@circleagency.co.uk

If you would like to withdraw consent, or if you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.