

Privacy Policy

Version 1.01, 26/10/2018

Introduction

The Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation (“GDPR”) impose certain legal obligations in connection with the processing of personal data.

Chill Out! Event Management Ltd is a data controller within the meaning of the GDPR and we process personal data including personal data regarded as sensitive.

The firm’s contact details are as follows:

Data Controller: Samantha Stirrup, Operations Director.
Address: Chill Out! Event Management Ltd
The Old Byre
Billingbear Farm
Billingbear Lane
Binfield
Berkshire
RG42 5PS

We may amend this privacy notice from time to time. If we do so, we will supply you with and/or otherwise make available to you via the company website a copy of the amended privacy notice.

Where we act as a data processor on behalf of a data controller (for example, when the client retains the role of data controller), we provide an additional schedule setting out required information as part of that agreement. That additional schedule should be read in conjunction with this privacy notice.

Where we engage a Third Party as data processor we will enter into an agreement with the Third Party clearly setting out their responsibility and accountability in terms in accordance with this policy.

The purposes for which we intend to process personal data

We intend to process personal data for the following purposes:

- To enable us to supply professional services to you as our client including the processing of sensitive data relating to allergies and dietary preferences
- To fulfil any obligations under relevant laws in force from time to time
- To enable us to invoice you for our services and investigate/address any attendant fee disputes that may have arisen.

- To contact you should the purposes for processing your personal data change or when additional consent is required.
- To use in the investigation and/or defence of potential complaints, disciplinary proceedings and legal proceedings.
- To contact you about other services we provide which may be of interest to you if you have consented to us doing so.

The legal bases for our intended processing of personal data

Our intended processing of personal data has the following legal bases:

- At the time you instructed us to act, you gave consent to our processing your personal data for the purposes listed above.
- The processing is necessary for the performance of our contract with our client.
- The processing is necessary for compliance with legal obligations to which we may be subject
- The processing is necessary for the purposes of the following legitimate interests which we pursue: the protection against potential legal and other disciplinary action.

Persons/organisations to whom we may give personal data

We may share your personal data with:

- any third parties with whom you require or permit us to correspond
- any subcontractors required to fulfil our contract with the client. If the law allows or requires us to do so, we may share your personal data with:
- the police and law enforcement agencies
- courts and tribunals
- the Information Commissioner's Office ("ICO")

We may need to share your personal data with the third parties identified above in order to comply with our contractual and legal obligations, including our legal obligations to you. If you ask us not to share your personal data with such third parties we may not be able to fulfil our contract with the client.

Third Party companies engaged as data processor

We may need to share personal data with Third Party companies where this is wholly necessary for the performance of our obligations under a contract with our client.

Where this is necessary we will engage the Third Party as a data processor within the meaning of GDPR and will put in place agreements with Third Parties stating the responsibilities and accountability of the Third Party as data processor.

These agreements will include terms that are at least commensurate with the responsibilities and obligations stated in this policy.

Personal data shared with a Third Party shall be limited to that required for the execution of their obligations under sub-contract with Chill-Out Event Management Ltd. and will be required to be deleted upon completion of their sub-contract.

All Third Party companies will be required to have adequate security policies in force and confirm in writing their compliance with GDPR prior to any personal data being shared.

Transfers of personal data outside the EEA

Personal data will only be processed in the EEA, unless notified to the contrary prior to your explicit consent being given.

Where personal data is transferred outside of the EEA it will be done so in accordance with Article 45, EU GDPR – Transfer on the basis of an adequacy decision, or when this is not applicable in accordance with Article 46, EU GDPR – Transfers subject to appropriate safeguards.

Retention of personal data

When acting as a data controller and in accordance with recognised good practice within the Event Agency Sector we will retain all personal data records as follows:

- where we are contracted to provide a single event it is our policy to retain personal data for a maximum of 2 Months from the event completion or any subsequent event reporting required by the client.
- where we are contracted to provide multiple related events or roadshows it is our policy to retain personal data for a maximum of 2 Months from the last event completion or any subsequent event reporting required by the client.

Our Security Policy provides for the destruction of documents and the deletion of electronic files that contain personal data at the end of the retention periods stated above. Client agreement to the contractual terms is taken as agreement to the retention of records for this period, and to their destruction thereafter.

Where we act as a data processor as defined in DPA 2018, we will delete or return all personal data to the data controller as agreed with the controller at the termination of the contract.

Requesting personal data we hold about you (subject access requests)

You have a right to request access to your personal data that we hold. Such requests are known as 'subject access requests' ("SARs").

Please provide all SARs in writing marked for the attention of The Data Controller.

To help us provide the information you want and deal with your request more quickly, you should include enough details to enable us to verify your identity and locate the relevant information. For example, you should tell us:

- your full name
- previous or other name(s) you may have used since
- your company name and employee number
- what type of information you want to know
- the back page of your passport or a copy of your driving licence; and

DPA 2018 requires that we comply with a SAR promptly and in any event within one month of receipt. There are, however, some circumstances in which the law allows us to refuse to provide access to personal data in response to a SAR (e.g. if you have previously made a similar request and there has been little or no change to the data since we complied with the original request).

We will not charge you for dealing with a SAR.

You can ask someone else to request information on your behalf – for example, a friend, relative or solicitor. We must have your authority to respond to a SAR made on your behalf. You can provide such authority by signing a letter which states that you authorise the person concerned to write to us for information about you, and/or receive our reply.

Where you are a data controller and we act for you as a data processor, we will assist you with SARs on the same basis as is set out above.

Putting things right (the right to rectification)

You have a right to obtain the rectification of any inaccurate personal data concerning you that we hold. You also have a right to have any incomplete personal data that we hold about you completed. Should you become aware that any personal data that we hold about you is inaccurate and/or incomplete, please inform us immediately so we can correct and/or complete it. We shall endeavor to do so within 1 month of any request.

Deleting your records (the right to erasure)

In certain circumstances you have a right to have the personal data that we hold about you erased. Further information is available on the ICO website (www.ico.org.uk). If you would like your personal data to be erased, please inform us immediately and we will consider your request. In certain circumstances we have the right to refuse to comply with a request for erasure. If applicable, we will supply you with the reasons for refusing your request.

The right to restrict processing and the right to object

In certain circumstances you have the right to 'block' or suppress the processing of personal data or to object to the processing of that information. Further information is available on the ICO website (www.ico.org.uk). Please inform us immediately if you want us to cease to process your information or you object to processing so that we can consider what action, if any, is appropriate.

Obtaining and reusing personal data (the right to data portability)

In certain circumstances you have the right to be provided with the personal data that we hold about you in a machine-readable format, e.g. so that the data can easily be provided to a new professional adviser. Further information is available on the ICO website (www.ico.org.uk).

The right to data portability only applies:

- to personal data an individual has provided to a controller;
- where the processing is based on the individual's consent or for the performance of a contract; and
- when processing is carried out by automated means

We will respond to any data portability requests made to us without undue delay and within one month. We may extend the period by a further two months where the request is complex or a number of requests are received but we will inform you within one month of the receipt of the request and explain why the extension is necessary.

Withdrawal of consent

Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

Please note:

- the withdrawal of consent does not affect the lawfulness of earlier processing
- if you withdraw your consent, we may not be able to continue to provide services to you or the client
- even if you withdraw your consent, it may remain lawful for us to process your data on another legal basis (e.g. because we have a legal obligation to continue to process your data)

Automated decision-making

We do not intend to use automated decision-making in relation to your personal data.

Notification of Breaches in Security involving personal data

While we do everything in our power to avoid breaches of personal data, in the unlikely event that one occurs that may cause harm to the data subjects we will follow the process set out in our Security Policy.

This includes, but is not limited to, notifying the client, subjects and office of the ICO within 72 hours of the nature of the breach and the personal data involved, taking all reasonable immediate measures to ensure no further breach is possible and conducting a full investigation into the nature and cause of the breach, the results of which will be used to improve current security controls and procedures.

Complaints

If you have requested details of the information we hold about you and you are not happy with our response, or you think we have not complied with the GDPR or DPA 2018 in some other way, you can complain to us. Please send any complaints to the Data Controller.

If you are not happy with our response, you have a right to lodge a complaint with the ICO (www.ico.org.uk).