**Privacy Statement and terms**

Pathway Events LTD collects data about individuals, usually within a business context. Pathway Events LTD treats all data which identifies an individual as Personal Data. Pathway Events LTD will be what’s known as the ‘Controller’ of the personal data you provide to us, this means we control what happens to the data in our possession.

We only collect basic personal data about you through interactions. It does not include any special types of information. This can, however, include name, address, email, phone number, IP address etc.

We need to know your basic personal data to provide you with information associated with our events, services and newsletter. We will not collect any personal data from you we do not need to provide and oversee this service to you.

All the personal data we process is processed by us in the UK. Data is located on servers within the UK, with the exception of the contact information from people who register to receive our newsletter. This information is stored and processed by MailChimp outside the EU. However, MailChimp complies with EU-US Privacy Shield.

No other 3rd parties have access to your personal data. We have a Data Protection regime in place to oversee the effective and secure processing of your personal data. Where third parties do have access those incidences are listed below.

In the case of the impossible objects programme of events we are working with IED.

By joining this programme, I declare having read IED - Istituto Europeo di Design [privacy policy](https://www.ied.edu/privacy-policy) and I hereby authoriSe the treatment of my personal data for the supply of the requested service or for the reply of information request.

I hereby authorize IED - Istituto Europeo di Design to the treatment of my personal data as a result of privacy policy for the purpose of advertising from the data controllers for each area.

I hereby authorize IED - Istituto Europeo di Design to the treatment of my personal data as a result of privacy policy for the purpose of communication to third entities.

**The information is processed for the following purposes:**

Data collected when an individual signs up to receive a regular newsletter bulletin data will be processed by Pathway Events using MailChimp. The data will only be used to send out the newsletter and the client will be able to unsubscribe at any time via MailChimp. Data will be deleted when users unsubscribe.

If at any point you believe the information we process on you is incorrect you can request to see this information and have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer, on info@pathwayevents.co.uk who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner’s Office (ICO).

**Log files**

When you visit this website we collect web statistics concerning your visit, which are stored in a log file. Log files allow us to record visitors’ use of the site. The web teams use Google Analytics to record visitors’ use of the site and use this information to make changes to the layout of the website and to the information in it. Log files do not contain any personal information and they

are not used to identify any individual patterns of use of the site. This statement only covers websites maintained by us, Pathway Events and does not cover other web sites linked from our Site.

**Data Controller and Owner**

For the purposes of the EU General Data Protection Regulation (GDPR) (EU) 2016/679, the responsible entity is:

Name: Antony Adams

Pathway Events LTD.

Company number 10488937

info@pathwayevents.co.uk

Suite 2A, Blackthorn House, St Paul's Square, Birmingham B3 1RL

**Third-party platforms - SMARTELLA**

For the benefits of our service we use Smartella technology

**Account Terms**

You must provide your full legal name, current address, a valid email address, and any other information needed in order to complete the signup process.

You acknowledge that Pathway Events will use the email address you provide as the primary method for communication via the Smartella platform.

You are responsible for keeping your password secure. Pathway Events cannot and will not be liable for any loss or damage from your failure to maintain the security of your account and password.

A breach or violation of any term in the Terms of Service as determined in the sole discretion of Pathway Events will result in an immediate termination of your services.

**In everyday language**

Don’t use Pathway Events for anything illegal or transmit any harmful code. Remember that with any violation of these terms we will cancel your service. If we need to reach you, we will send you an email.

**Data we might collect**

When you visit our website, our server temporarily saves details of your access in its logs.

These logs contain the following data, and are kept until their automatic deletion:

* The IP address of the computer making the request
* The date and time of your request
* The requested URI
* The amount of data transferred to you in response
* Whether the request was successfully processed or not
* Identifying data about the browser and operating system you use
* The referring website from which you made the request
* The name of your Internet Service Provider

The purpose of recording this data is to make it possible to serve the website to you (by establishing a TCP/IP connection), to secure our servers, the technical administration of our infrastructure as well as the optimisation of our services. Only in the case of unauthorised access or attacks on our infrastructure will your IP address be analysed.

No further information is required from you in order to access our website other than that listed above.

Among the types of Personal Data that we collect via Smartella from Users, by itself or through third parties, there are:

 • First Name & Last Name

 • Phone number

 • Email

 • Address, State, Province/Region, ZIP/Postal code, City, Country

 • Password

 • Cookie and Usage Data, IP address.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using Smartella via Pathway events.

Any use of Cookies – or of other tracking tools – by Pathway Events or by the owners of third-party services used by Pathway Events, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User.

Failure to provide certain Personal Data may make it impossible for Pathway Events to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through Pathway Events and confirm that they have the third party’s consent to provide the Data to the Owner.

**The use of the Data processed by the Service**

All Data processed via the analysis conducted by Pathway Events are used by Pathway Events only for the purpose of providing the service to the Users. Such data will not be transferred or sold by Pathway Events to any third party, nor will it be used by the Owner for any purpose connected to Pathway Events own business. The Owner reserves the right to aggregate the Data imported on the application by the different Pathway Events Users, for the purpose of creating anonymised aggregated metrics. Where this is not possible, in cases where programmes, activities or events have been delivered in partnership with a third-party organisation. Third-party partnerships will be made explicitly clear in the description of a programme, activities or events.

#### **Keeping your data secure**

In order to secure your data, we have put in place technical and organisational measures which meet the requirements of the GDPR, and require any third-party service providers we use to do the same.

When we use third parties to provide the services, for example, infrastructure service providers, these third parties are only engaged after a comprehensive review.

Your data is only ever saved on secure servers, which may only be accessed by authorised personnel.

#### Third-Party Service Providers in non-EEA Countries

In order to provide our services, we use third-party services located outside the European Economic Area. Where such transfer occurs, Pathway Events ensures that such transfer occurs under the necessary legal provisions as required by the applicable legislation in order to provide for an adequate level of protection of Your Personal Data (e.g. adequacy decision of the EU commission (e.g. [EU-US Privacy Shield](http://www.privacyshield.gov/)), binding corporate rules, or [EU standard contractual clauses](http://ec.europa.eu/justice/data-protection/international-transfers/index_en.htm))

#### **Use of Cookies**

In addition to the previously listed data, cookies will be saved on your computer when you use our website. Cookies are small pieces of textual data which are saved on your hard disk by your web browser, through which Pathway Events, who sets the cookie’s contents, can collect certain information about you. Cookies cannot execute any code, nor transfer any viruses to your computer. We use them in order to anonymously or pseudonymously analyse the use of the website, and present relevant offers to you.

This website uses the following types of cookies, whose scope and functionality is detailed in the following paragraphs.

- Transient cookies are automatically deleted when you close your browser. They are used particularly as session cookies. These save a so-called “session ID” which is used to link subsequent requests made by your browser to each other. Through this, your computer can be recognised when you return to our website. These session cookies are deleted when you log out or close your browser.

- Persistent cookies are only deleted after a predetermined duration, which can be different for each cookie. You can delete these persistent cookies anytime, though the “Settings” configuration of your browser. We advise you, that if you do so, that not all functionality of this website will be available in some cases.

The placement of cookies on your computer can be prevented through the relevant settings of your internet browser. Previously set cookies can also be deleted through the settings of your browser. We advise you that preventing the placement of cookies on your computer can mean that not all functions of our website are available without limitations.

#### **Registration**

The data subject can register on the website. For this to take place, it is required that the data subject enter their details in the relevant signup forms. The data given by the data subject to register will solely be used for registration, and not passed to any third parties unless Pathway Events has a lawful ground to do so. In the course of registration on our website/platforms, your IP address, date and time of access will be recorded, in order to prevent any potential misuse. During, or after the registration, the data subject is free to alter their personal data. It is also possible for the data subject to completely cancel their registration so that all personal data is deleted.

**Changes to this Privacy Policy**

Pathway Events reserves the right to update this Privacy Policy from time to time without notice. Any changes are effective when we post the updated Policy on our website. We recommend that you regularly check back. We may provide you with notices about changes to this Privacy Policy if you are a registered user of Pathway Events platforms.

#### **Contact**

Should you have further questions, or wish to make contact with us, you can write us an email to info@pathwayevents.co.uk . When you do so, the data required to answer your query will be automatically saved and processed. Your data will not be transferred to third parties unless Pathway Events has a lawful ground to do so.

**Deletion of Personal Data**

Pathway Events only keeps and processes personal data for so long as it is necessary. When the purpose of the data processing has been fulfilled, your personal data will be deleted in accordance with our data retention policy, unless we are legally required to retain it.

**Right to Access, Change, or Delete Personal Data**

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

**Right to Access**

Users have the right to know what personal data about them is included in the databases and to ensure that such personal data is accurate and relevant for the purposes for which Pathway Events collected it. Customers may review their own personal data stored in the databases and correct, erase, or block any data that is incorrect, as permitted by applicable law and Pathway Events policies. Upon a reasonable request, Pathway Events allows users access to their personal data, in order to correct or amend such data where inaccurate. Customers may edit their personal data by logging into their account profile or by contacting Pathway Events by phone or email. In making modifications to their personal data, Users must provide only truthful, complete, and accurate information. To request erasure of personal data, customers should submit a written request to info@pathwayevents.co.uk

**Requests for Personal Data**

Pathway Events will track each of the following and will provide notice to the appropriate parties under the law and contract when either of the following circumstances arise: (a) legally binding request for disclosure of the personal data by a law enforcement authority unless prohibited by law or regulation; or (b) requests received from the Data Subject. If Pathway Events receives a request for access to his/her personal data from a customer, then, unless otherwise required under law or by contract with such customer, Pathway Events will refer such Data Subject to the customer.

**Satisfying Requests for Access, Modifications, and Corrections**

Pathway Events will endeavour to respond in a timely manner to all reasonable written requests to view, modify, or inactivate personal data.

**Questions, Complaints, Dispute Resolution**

Pathway Events commits to resolve complaints about our collection or use of your personal information. European Union individuals with enquiries or complaints regarding our Privacy policy should first contact Pathway Events at info@pathwayevents.co.uk . Additionally, you always have the right to make a complaint to the relevant authorities (https://ico.org.uk/) regarding our processing of your personal data.

**Our responsibilities as a Data Processor**

As a services provider who stores the personal information of EU citizens on behalf of Data Controllers, we have certain responsibilities under GDPR which we comply with, including:

Managing Data Processing - Pathway Events has clear documentation on where our data comes from, how it is stored, and where it goes after we get it. Pathway Events will only process personal data on instructions from the controller, and inform the controller if it believes said instruction infringes on the GDPR (28.3)

Accountability and Governance - Pathway Events takes extraordinary steps to secure your data, ensure stability and uptime, manage data backup and disaster recovery, and regularly test security (32.1)

Authorized Use of Sub-Processors - Pathway Events uses subprocessors as a routine part of offering our service. It is our responsibility to ensure our subcontractors comply with GDPR, and we will comply with those rules. As a Data Controller, your agreement to our use of sub-processors is part of our legal Terms of Service and required to be an Pathway Events user. We maintain a list of sub-processors which can be provided upon request.

**How you can exercise your rights**

Should you wish to exercise any of these rights, you will need to provide proof of identification that you are the person to whom the data relates. The data you will receive includes data we have related to you, the source of that data, the recipients, or types of recipients to whom the data was transferred, and the purposes for which the data was stored. To exercise these rights, please contact our support at info@pathwayevents.co.uk

Updated June 2020