

PHORIX LIMITED

INTRODUCTION

Welcome to the Phorix Limited ['Phorix', 'we' or 'us']. Phorix respects your privacy and your personal data. This privacy notice is intended to inform you about how we deal with and look after your personal data when you visit and use our website. It also tells you about your privacy rights and how the law protects you.

This privacy notice contains a number of sections that you can click through to in order to arrive at specific sections of the privacy notice. If you wish, you may download a copy of this notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice is aimed at giving you information on how Phorix Limited and processes your personal data when you use our website.

This website is not intended for children and we do not knowingly collect data relating to children or sell tickets to those under 18 years of age.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements our other notices, and our terms and conditions, and is not intended to override them.

CONTROLLER

Phorix Limited is the controller and is responsible for your personal data. In

Our full details are:

Phorix Limited
Churchill House
142-146 Old Street
London
EC1V 9BW

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.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version of our privacy notice was last updated on 27th August 2019. Older versions of our privacy notice can be obtained by contacting us.

The data protection law in the UK changed on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) as we work towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. In particular, you can subscribe to our email newsletter through MailChimp. Clicking on those links, or using those payment methods may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. These include:

- We collect your **first and last name**;
- We collect contact data for you, including your **billing address, delivery address, email**

address and telephone number;

- We collect your financial details if you are a customer of ours, including your **bank account** and **payment details**;
- We collect marketing and communications data including your **preference in receiving emails from us**;
- We collect technical data about your visit through the use of **cookies and analytics data**, including your **IP** (internet protocol) address, **browser type and version**, **operating system and platform** and other technology on the devices you use to access this website;

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We **do not collect any Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. 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, Contact and Marketing and Communications data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Call or contact us; or
 - subscribe to our email list.
- **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 **INSERT LINK HERE** for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties. For example, we receive technical data about your visits from providers of web analytics such as Google, based outside the EU.
- We also receive Contact, Financial and Transaction Data from our **banking and accounting systems** when you pay for any of our services.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data in accordance with the law. In general terms, we will use your personal data where:

- We need to conclude a contract with you (for example taking your contact details in order to start providing you with services);
- Where you give us your consent (for example if you opt-in to be notified about tickets available in your area);
- Where it is necessary for our legitimate interests and your interests do not override our interests;
- Where we need to comply with a legal or regulatory obligation.

In particular, we have laid out below the ways in which we will use your personal data, and the reasons that we use that data. We may process each piece of data for more than one reason. Please **CONTACT US** if you would like more details about the way in which we process your personal data.

Activity	Type of Data We Collect	Why we can collect this data
Registering you as a customer	Your name and email address	In order to perform a contract with you (i.e. to perform the services we offer)
To process payments and send invoices	Your name, your address, your email address, your telephone number, your payment details and bank account details	In order to perform a contract with you (i.e. to send you invoices and process your payments)
To deliver information via email newsletter to you including by making suggestions about tickets you may be interested in	Your name and your email address	You may consent to opt-in to our email marketing list via our website. You can opt-out of this list at any time and for whatever reason (see below)
To use data analytics to improve our website, services and customer experience	Your technical data including cookies, your IP address, your location and your browser details, as well as usage data	This is necessary for our legitimate interests in order to develop our business, keep our website running smooth and efficiently, and to inform our marketing strategy

MARKETING COMMUNICATIONS

From time to time, we may contact you via email or telephone or post regarding services we feel may be of interest to you. We may use your name, email address and data from previous transactions to inform you of these services (for example, contacting you to see whether you would like to add particular services to those that we provide to you).

You will receive these marketing communications from us if you opt-in to them on our website and if you have not opted-out of such communications.

You have the right at any time to stop us from contacting you for marketing purposes. If you wish us to stop contacting you for marketing purposes you may email us mark@thephorixgroup.com

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **contact us**.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with some third parties for the reasons set out below. For example:

- We share your data with our payment processors including our bank and our accounting services, who process your personal data in order to take your payments and send invoices;
- We share your data with our email marketing provider, to enable us to send emails to those who have subscribed to email updates to us;
- We may share some of your data with our web developers, who have access to this site when they are implementing positive changes to your experience on this website;
- We may share some of your data with our professional advisers, for example our lawyers, bankers and accountants who provide us with business services;
- We may share some of your data with HM Revenue & Customs and other regulators who require us to report our business activities in certain circumstances;
- We share some of your data with our website analytics providers, who provide us with data to help our website run smoothly and efficiently, and help our business grow.

Additionally, we may choose to sell, transfer or merge parts of our business or our business assets. We may also seek to acquire other businesses or merge with them. If a change happens to our business, the new owners will use your personal data in the same way as set out in this privacy notice. (

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Our internet servers are based in the United Kingdom of England and Wales. For now, this is a jurisdiction within the EEA. As Brexit progresses, we will review and update this section of our privacy policy to ensure that it remains up to date.

Many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it.

- Where we use providers based in the US (for example MailChimp (The Rocket Science Group LLC). and Google, LLC), we may transfer data to them if they are part of the EU-US 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.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

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.

In some circumstances you can ask us to delete your data (see below).

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- **Request access** to your personal data. You can receive a copy of the personal data we hold about you and to check that we are lawfully processing that data;
- **Request correction** of the personal data we hold about you. You can ask that any incomplete or inaccurate data we hold is corrected. We may have to verify the accuracy of the new data you provide to us;
- **Request erasure** of your personal data. You have the right to ask us to delete or remove personal data where there is no good reason for us to continue to hold and process it. You can also ask us to delete data where you have exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data in accordance with the law. We may not always be able to comply with your request for deletion for legal reasons but we will notify you of these reasons, if applicable.
- You can **object to processing** of your personal data where we rely on a legitimate interest to process that data and you feel that there is something which impacts on your fundamental rights and freedoms. You can also object to any processing for direct marketing purposes.
- You can **request restriction of processing**. 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.
- You can **request the transfer** of your personal data to you or a third party. We will provide your data in a structured, machine-readable format. This only applies to information you consented to give us or information that was necessary for the purchase of tickets.
- You can **withdraw your consent** at any time where we are relying on your consent to process your personal information. 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.

If you wish to exercise any of the rights set out above, please **CONTACT US**.

NO FEE USUALLY REQUIRED

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.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.