



PRIVACY NOTICE

Ginger Owl Productions (Events) Limited (**Ginger Owl, us, we, our**) is committed to protecting the privacy of all visitors to, and users of, our website and/or data entry portals, including our accreditation platforms (**platform**) and other users of our services.

Please read the following privacy notice that explains how we use and protect the personal information of data subjects that have been provided to us in the course of our services.

Unless you are told otherwise, for example by way of a separate privacy notice, we will be the data controller of the information provided to us, and when we refer to "you" we mean the person to whom the personal data relates (**data subject**), whether that person provides the data directly to us or that data is provided on the data subject's behalf.

1. CONTACT DETAILS

If you have any queries or requests concerning this privacy notice or how we handle your data more generally, including any requests to exercise your legal rights, please contact us at info@gingerowl.co.uk.

2. HOW WE COLLECT YOUR INFORMATION

We may collect and process data through contact forms on our platform, by e-mail or otherwise from interactions with you (such as by post or phone) in the course of providing our services to you or to persons or entities who have engaged us to provide accreditation and other services (**Partners**). This includes where you create an account on or otherwise upload your information to a platform that we operate, and when you contact us to give us feedback.

Partners may also provide us information about you directly, for example to enable us to add your details to our platform whilst we operate with a Partner to provide services related to an event that you are associated with.

We may also use automated technologies or interactions to collect Technical Data and/or Usage Data (as described below) as you interact with our platforms.

3. INFORMATION WE COLLECT FROM YOU

Where you provide us with information in connection with our accreditation service, this data may include, without limitation:

- **Identity Data** including: first name, last name (or similar identifier), vehicle registration, post code, date of birth, photograph, and other personal identity data relates to the accreditation services.
- **Contact Data** including: email addresses, mobile phone number.



- **Employment / Event Data** including: payment information, working times and locations, travel information, job role and title, equipment or accommodations that relate to the individual, health and safety or policy documentation issued by the individual's employer, risk assessments issued by the individual's employer, passport, flight information, visa documents.
- **Artist Information** including: technical and hospitality information that relate to artists performing at events.

Additionally, through each of your visits to, or use of our platform, we may collect:

- **Technical Data** including: the type of device(s) you use, a unique device identifier, the Internet protocol (IP) address used to connect your device(s) to the Internet, network information, browser type and version, time zone setting, browser plug-in types and versions and operating system and platform.
- **Usage Data** including: statistics around email opening and clicks, traffic data; location data; weblogs and other communication data; the full Uniform Resource Locators (URL) clickstream to, through and from our platform; what you viewed or searched for; page response times, download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page.
- **Feedback** including: information you provide when you contact us or provide us with feedback.

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, for example a new address or email address.

4. USE OF YOUR INFORMATION

We will only process the data we collect about you if there is a reason for doing so, and if that reason is permitted under data protection law (known as a **legal basis**). We rely on one or more of the following legal bases:

- **Necessary to perform a contract:** if we need to process your information in order to provide you with services you have requested or to enter into or perform a contract, or to enable a Partner to perform or enter into a contract with you (for example, if you are providing services at an event using our platform).
- **Consent:** where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.
- **Legitimate interest:** we may use your personal data where it is necessary to conduct our business and pursue our legitimate interests. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).



- **Legal obligation:** we may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

We may use your personal data for the following purposes with the following legal bases:

- We may use **Identity, Contact, Employment/Event** and/or **Artist Data** (as applicable) to register you on one of our platforms and communicate with you and otherwise provide services to you, or that are related to you. This would be because it was **necessary to perform a contract** or for our **legitimate interest** of providing accreditation services at events, as well as responding to queries from you (for example, through a form on our platform or if you get in touch with us via email or phone). It may also be due to one of our **legal obligations**.
- We may use **Identity** and **Contact** information to manage our relationship with you, including notifying you of updates or changes to our policies or platforms and dealing with your requests, comments or queries. This would be when **necessary to perform a contract**, out of **legal obligation**, or where **necessary for our legitimate interest** of keeping our records up to date and managing our relationships.
- We may gather **Technical Data, Usage Data** and **Feedback** for data analytics and to deliver relevant content to you, including to improve our platform, troubleshoot or test our platform and protect our business, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing statistics. This would be because it was necessary for our **legitimate interest** of keeping our products and services up to date and secure and to develop our business and strategy. It may also be due to **legal obligation**.

At certain times during your interactions with our platforms, you may be asked to indicate your preferences for receiving direct marketing communications from us. You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us on the details above.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

5. USE OF YOUR INFORMATION – SPECIAL CATEGORY INFORMATION

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection. We may process special categories of personal information only in limited circumstances, like with your explicit written consent or where we need to carry out our legal obligations or exercise rights in connection with employment. Less commonly, we may process this type of information where it is needed in relation to legal claims

In general, we will not process particularly sensitive personal information about you. The limited circumstances we might do so include, for example, if your membership



to a union or health data needs to be recorded in our platform to enable you to provide services to, or receive services from, one of our Partners.

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do approach you for consent, please be aware your access to our platform will never be conditional on such consent.

Please contact us for more information relating to the steps we take to protect your sensitive personal information.

6. FRAUDULENT USE

Where we believe or detect fraudulent or malicious activity, we may block you from using our platform and/or sending emails to us.

7. RETENTION OF YOUR INFORMATION

We will not retain your information for any longer than we reasonably think is necessary. Generally speaking, if you have provided your personal data for use on of our platforms in relation to a specific event, we will not retain this for longer than two years following the end of the event.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- our legitimate interests where we have carried out balancing tests (see section on 'How we use your personal information' above);
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information where we no longer require your information for the purposes collected.

8. DISCLOSURE OF YOUR INFORMATION

Subject to the other terms of this notice, we may share your personal data with the following third parties:

- Our Partners.
- Our professional or legal advisors, government authorities and/or law enforcement officials, and other organisation we're legally obliged to share



personal information with or where we have reason to believe that disclosing this data is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with the rights or property of us or our Partners.

- Our suppliers who perform functions on our behalf, such as hosting or operating our platform, sending e-mails, managing email marketing, and carrying out data analysis.
- If applicable, other entities within our corporate group. We may also transfer or assign personal data to third parties in connection with a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation.
- For analytics purposes, we may share with other third parties (such as Google Analytics) certain aggregate statistical data about purchases and the use of our content, which data may include demographic data such as the age range and/or geographic location of groups of users. No personal data (such as names or email addresses) will be identifiable from such statistics.

Ginger Owl will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice when it is transferred to third parties.

9. INTERNATIONAL TRANSFER

The data that we collect may be transferred to, and stored, outside of the UK. For instance, if any of our, or any of our EEA-based service providers', servers from time to time are located outside the EEA; if one of our service providers or suppliers is themselves located in a country outside the EEA; or if we share your data (in accordance with the 'How we share your data' section above) with, for example, our Partners overseas.

Where information is transferred outside the UK, and where this is to a country that is not subject to an applicable adequacy decision (such as countries within the EEA), we always ensure that a similar degree of protection is afforded to it and that appropriate safeguards are in place. This might involve, for example, us entering into the ICO-approved UK Data Transfer Agreement with the third party or otherwise ensuring the transfer falls under a derogation permitted under applicable data protection laws.

10. SECURITY

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected.

We take steps to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to us via email or via our platform; any transmission is



at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our platform may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections 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 platform, we encourage you to read the privacy policy of every website you visit.

11. YOUR RIGHTS

Under data protection law, you may have a number of rights concerning the data we hold about you. If you wish to exercise any of these rights, please contact us using the contact details set out above. For additional information on your rights please contact your data protection authority and see below.

The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this notice.

The right of access. You have the right to obtain access to your information (if we're processing it). This will enable you, for example, to check that we're using your information in accordance with data protection law.

The right to rectification. You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by contacting us.

The right to erasure. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you by contacting us.

The right to restrict processing. You have rights to 'block' or 'suppress' further use of your information in certain circumstances. When processing is restricted, we can still store your information, but will not use it further.

The right to data portability. You have the right to obtain your personal information in an accessible and transferable format so that you can re-use it for your own purposes across different service providers. This is not a general right however and there are exceptions.

The right to withdraw consent. If you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. Withdrawing consent will not however make unlawful our use of your information while consent had been apparent.

The right to object to processing. You have the right to object to certain types of processing, including processing for direct marketing and profiling. You can object by



changing your marketing preferences, disabling cookies as set out above or by getting in touch.

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 could refuse to comply with your request in these circumstances.

12. CHANGES TO OUR PRIVACY NOTICE

Any changes to our privacy notice will be posted to our platform and, where appropriate, we will notify you of the changes for example by email or push notification.

13. COMPLAINTS

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice. If you are not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (**ICO**) using the following details:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

This privacy notice was last updated on 6th February 2025.