

# Green Street Blues

Women singing a cappella

## Data Protection and Retention Policy

### Introduction

1. “Green Street Blues” (“GSB”) is the name of an unincorporated association of individuals which is based in Sevenoaks, Kent. Its principal aim is to encourage and develop a cappella harmony singing by women in both chorus and smaller groups. GSB’s purpose and rules are set out in its constitution, to which all of its members have agreed. The association does not have charitable status. GSB retains under contract a director of music who is an *ex officio* member under the GSB constitution: except where the context otherwise indicates, references below to “member/s” in this policy include GSB’s director of music.
2. In order to be able to further the activities of the association, GSB needs to gather, store and use personal data about its members and other individuals (“non-members”) such as potential members, audiences and potential audiences, supporters, suppliers, business contacts and other people with whom it has a relationship or need to be in contact.
3. This Data Protection and Retention Policy describes how personal data are collected, used and handled by and on behalf of the members of GSB. It is an internal document created to establish and record GSB’s data protection and retention procedures and to ensure that GSB:
  - (a) protects the rights of individuals whose personal data it processes;
  - (b) complies with the UK General Data Protection Regulation, read with the Data Protection Act 2018 (for convenience, referred to in this policy as the “UK GDPR”), and follows good practice;
  - (c) is transparent about how it processes individuals’ data;
  - (d) protects its members from the risks of a data breach.
4. A data breach may result in personal liability for criminal or civil action (including fines and awards of damages) and in loss of confidence in the integrity of GSB’s procedures and damage to GSB’s reputation. GSB may need to take action where a person fails to comply with the UK GDPR. Members are also reminded of paras 3.5.1-3.5.3 of GSB’s constitution concerning the Committee’s powers where a member acts illegally or against GSB’s policies.

### Definitions

5. The following definitions apply in this policy:
  - (a) ***Personal data***: information relating to a living natural person who can be identified or who is identifiable directly from the information in question, or indirectly from that information in combination with other information.
  - (b) ***Data subject***: a living natural person who can be identified from personal data. A deceased individual, or a limited company, public body or other entity having a legal personality separate to its owners, is not a data subject and information relating to them is not personal data.

- (c) *Processing*: any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- (d) *Processing by automated means*: includes processing (such as storage, retrieval, use and transmission) of data electronically (e.g. by computer, mobile phone, tablet, etc).
- (e) *Processing covered by the UK GDPR*: the UK GDPR applies to personal data processed wholly or partly by automated means and to personal data processed in a non-automated manner (e.g. paper records) which forms part of, or is intended to form part of, a 'filing system' (a structured set of personal data which are accessible according to specific criteria).
- (f) *Electronically-held data* includes data in emails, WhatsApp messages, spreadsheets, electronic documents (including "members' contact lists" as further defined in para13 below).
- (g) *Physically-held data* includes data in paper documents and notes (e.g. membership forms; clothing size forms, email sign-up sheets).

### **Roles and Responsibilities**

6. This policy applies to all members of GSB and anyone else involved in the activities of GSB. It applies to all personal data that are held electronically or physically. Personal data includes:
  - (a) names of individuals
  - (b) postal addresses
  - (c) email addresses
  - (d) telephone numbers
  - (e) any other personal data relating to living individuals.
7. The GSB Chair is the Data Controller for GSB and, in consultation with the committee, will determine what information is collected and how it is used. Any questions relating to the collection or use of data should be directed to the Chair as the Data Controller.

### **Contact details**

8. Name: Green Street Blues  
 Address: We don't have a group address or telephone number but we can be contacted by email or via our website contact page.  
 E-mail: The Chair at gsbsingersr@gmail.com.  
 Website: <https://greenstreetblues.org/>

## **Data Protection**

### **Principles**

9. GSB is committed to complying with the seven principles of processing of personal data set out in Article 5 of the UK GDPR. Six of these principles require Personal Data to be:
  - (a) processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”);
  - (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (“purpose limitation”);
  - (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimisation”);
  - (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”);
  - (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (“storage limitation”);
  - (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage; using appropriate technical or organisational measures (“security, integrity and confidentiality”).
10. The seventh principle is that the Data Controller is responsible for, and will be able to demonstrate compliance with, the data protection principles listed above (“accountability”).

### *“Lawfulness, fairness and transparency”*

11. GSB will only process personal data where lawful and where it is necessary for the legitimate purposes of the association.
12. On or after becoming a member of GSB:
  - (a) the member’s name, contact details and date of birth are collected by the Membership Secretary:
    - (i) name and contact details are used to contact the member regarding GSB membership, administration and activities;
    - (ii) name, contact details and date of birth are provided to the Ladies Association of British Barbershop Singers (“LABBS”) for registration and insurance purposes;
  - (b) the member’s bank details and other financial data are collected by the Treasurer for the purpose of administering the receipt of monthly

subscriptions and other sums due or paid by the member and may be collated to record the member's payment history and any outstanding sums;

- (c) the member's details of her clothing size, body measurements and shoe size are collected by the GSB Wardrobe Manager, to enable GSB to issue to the member a fitted set of chorus clothes to be worn during GSB performances. These details are only shared with suppliers on an anonymous basis for the purpose of ordering clothing;
  - (d) a member's personal data held by individual committee members may be provided to other GSB committee members when and to the extent necessary for the proper functioning of the committee and (at the discretion of the Chair) to the members generally for the proper functioning of the Association;
  - (e) a member's personal data may be recorded in minutes of GSB meetings prepared by the Secretary and distributed to members.
13. In furtherance of its principal aim (para 1 above), and in addition to communicating with each other in connection with GSB's administration and activities, GSB's members actively seek to provide support to each other by encouraging smaller group meetings at individual members' homes to learn basic music theory or to rehearse GSB's repertoire either generally, in sectionals or individually (one-to-one), and also to foster practical support between members (e.g. in arranging lifts to rehearsals and performances). For these purposes, GSB members' names and contact details are collated by the Membership Secretary into a list (a "members' contact list") which is updated periodically and circulated to all members electronically. The Membership Secretary will ask members on joining GSB if they wish to opt out of having their data used in this way and members may opt out at any late stage by notifying the Membership Secretary. However,
- (i) a member's personal information may also be stored and used, with the express or implied consent of the member, for social purposes by another member;
  - (ii) such social information is not part of a members' contact list, nor is it data processed on behalf of GSB, and is not subject to this policy.
14. The lawful basis for processing the data in paras 12 and 13 above is contract (in the wider context of the constitution and its aims, the processing of members' data is reasonably necessary and proportionate to enable members to perform the agreement underlying the constitution).
15. The name and contact details of persons enquiring about GSB membership, applicants for, and participants in, GSB's "Love to Sing" course (or similar) and any other potential members are passed to the Membership Secretary and are used to contact such individuals regarding GSB potential membership, administration and activities. The lawful basis for processing this data is legitimate interests (it is necessary for the purposes of the legitimate interests pursued by GSB or by a third party in being able to identify and contact

individuals who attend and take part in GSB practice sessions and other activities with a view to joining GSB and those interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data).

16. On joining GSB, members are asked for their consent to supply the day and month of their birthday to the GSB Social Secretary/Birthday Monitor, which is informally shared near that date with other members to enable GSB members to celebrate each other's birthdays at an appropriate time. The lawful basis for processing this data is consent (see 'How we get consent') which the member can withdraw at any time by contacting GSB's Chair or Membership Secretary.
17. The name and contact details of non-members who book GSB to perform will be collected for the purpose of contacting them about their booking and to allow entry to the event. The lawful basis for processing this data is contract (the processing of this data is reasonably necessary and proportionate to enable GSB to perform the agreement underlying the booking).
18. Occasionally, GSB will use:
  - (a) An online event ticket shop, a facility provided by Zimma Ltd, trading as "Ticket Tailor";
  - (b) online and in-person card payment facilities, provided by Squareup Europe Ltd.

Appendix 1 to this Policy provides details of the data processed in connection with these facilities.

19. Photographs/video footage may be taken on behalf of GSB at its rehearsals and performances and posted on its website or used in emails/social media. The lawful basis for processing this data that it is a legitimate interest pursued by GSB in promoting its activities.
  - (a) Before first taking part in a rehearsal/ performance, members and prospective members are asked if they wish to opt out of having their data used in this way. If they do wish (then or subsequently) to opt out, they should inform the Chair who will arrange for them not to be photographed/videoed or, where that is not practical, for relevant photographs/videos either to be edited to exclude or obscure them, or not used.
  - (b) Audience members will usually not be identifiable when included in photographs/videos but any concerns in this regard should be referred to a member of GSB or the GSB photographer/videographer before or at the event.
  - (c) This policy does not apply to photographs or videos taken at a GSB rehearsal/performance by individuals on their own behalf.
20. GSB may also collect the name and contact details of individuals to enable GSB to promote its events by direct email or text to them. GSB will only do this where the recipient of the direct mail or text has previously given express

consent to such communications being sent and that consent has not been withdrawn.

*“Purpose Limitation”*

21. When collecting data, GSB will provide a clear and specific privacy notice explaining to the subject why the data is required and what it will be used for, unless the data subject already has that information. Our current privacy notices comprise:

- (a) Privacy Notice for Members;
- (b) Privacy Notices for Non-Members;
- (c) Privacy Notice for Visitors to the Event Ticket Shop Website.

The appropriate notice will be made available at the time when data is first collected either in printed form or by reference to the appropriate website.

*“Data Minimisation”*

22. GSB will not collect or store more than the minimum data required for its intended purpose.

*“Accuracy”*

23. GSB will ask its members on an annual basis to check and where appropriate update the data they have previously supplied to GSB. Members may update their data at any time by contacting the Membership Secretary, Wardrobe Manager or Treasurer (as appropriate) in the first instance.

*“Storage limitation”*

24. GSB will keep data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (unless there is a legal requirement to keep such data). The storage and intended use of data will be reviewed in line with the Data Retention provisions of this policy.

*“Security, integrity and confidentiality”*

25. GSB does not have an office and does not operate a dedicated electronic data processing system. All electronically-held data is processed on its members’ devices (desktops, laptops, tablets, mobile phones, etc). Physically-held data is stored and accessed at members’ homes.

26. GSB will ensure that all personal data held on its behalf by its members are kept secure at all times.

- (a) Electronically-held data are always held within a password-protected and secure environment.
  - (i) “Password” includes access by fingerprint and by face identification.

- (ii) Passwords are “strong” passwords that are not easy to guess.<sup>1</sup>
  - (iii) Devices are safeguarded by up-to-date anti-virus protection and updates to operating systems are installed promptly.<sup>2</sup>
  - (iv) Devices at home that are also used by family members should ideally be configured to have a separate user account for GSB matters with its own separate password; alternatively, the device is only used for GSB matters if the member concerned is satisfied that other users will not access GSB material.
  - (v) Members will at all times keep portable devices safe from theft or loss. Such devices are set to lock automatically when not in use.
  - (vi) Backups of personal data held on CD, USB drive, portable hard drive or similar are stored in a locked drawer or cupboard.
- (b) Physically-held data are stored in a locked drawer or cupboard.
- (c) Access to data will only be given to other third parties where it is clearly necessary for the legitimate purposes of the association. The Chair will decide in what situations this is applicable and will keep a master list of who has access to data.
- (d) Where a member succeeds another in a GSB role or position:
- (i) electronic data held in connection with that role or position:
    - will be copied and transferred securely to the successor member in that role or position, and
    - will be deleted permanently from the outgoing member’s device(s) (including by deleting files held in the “recycle bin”, “trash” or similar deletion recovery folder);<sup>3</sup>
  - (ii) physical data held in connection with that role or position will be transferred securely to the successor member and any copies retained by the outgoing member will be shredded or otherwise disposed of securely.

### ***How we get consent***

27. A member’s day and month of their birth is processed only if that member unambiguously gives consent on becoming a member of GSB. That consent may be withdrawn at any time by contacting GSB’s Chair or Membership Secretary.

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<sup>1</sup> The UK National Cyber Security Centre recommends using a combination of three random, memorable but hard-to-guess, words.

<sup>2</sup> Continuing free support by Microsoft of its Windows 10 operating system officially ends in October 2025, after which the operating system will cease to be a secure environment. Members wishing to continue using Windows must (a) upgrade their existing PCs to Windows 11, or (b) pay Microsoft to subscribe to its Extended Security Updates (ESU) program for Windows 10 for as long as that program is available; or (c) acquire a new PC that runs Windows 11.

<sup>3</sup> A file may be deleted permanently without being transferred into the recycle bin (PC) or trash (Mac) by pressing *shift+delete* to delete (PC) or *option+command+delete* (Mac). Mobile devices usually have a “recently deleted” file that must also be cleared of relevant GSB items.

### ***Transfer to countries outside the UK***

28. GSB will not transfer data to countries outside the UK except:
- (a) in accordance with Part V of the UK GDPR (transfer is based on Adequacy Regulations under the Data Protection Act 2018 or appropriate safeguards have been provided), or
  - (b) in the case of a photograph posted on the GSB website (which may be accessed by persons outside the UK), where no identifiable person in the photograph has opted out of its use by notice to GSB.

### ***Data protection provisions in supplier contracts***

29. GSB will ensure that supplier contracts contain adequate data protection provisions.

### ***Individual Rights***

30. When GSB collects, holds and uses an individual's personal data, that individual has the following rights over that data. GSB will ensure its data processes comply with these rights and will make all reasonable efforts to fulfil requests from an individual in relation to them.
- (a) **Right to be informed:** whenever GSB collects data, it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used, unless the data subject already has that information.
  - (b) **Right of access:** individuals can request to see the data GSB holds on them and confirmation of how it is being used. Requests should be made in writing to the Chair and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.
  - (c) **Right to rectification:** individuals can request that their data be updated where it is inaccurate or incomplete. GSB will request that members update their data as required. Any requests for data to be updated will be processed within one month.
  - (d) **Right to object:** individuals can object to their data being used for a particular purpose. GSB will always provide a way for an individual to withdraw consent in all promotional communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual or legal obligation.
  - (e) **Right to erasure:** individuals can request for all data held on them to be deleted. GSB's data retention policy ensures data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made, we will comply with the request unless:
    - (i) There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.

- (ii) There is a legal requirement to keep the data.
- (f) Right to restrict processing: individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, GSB will restrict the data while it is verified).
- (g) Although unlikely to apply to data processed by GSB, GSB will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

### ***Information Commissioner: providing information and payment of fee***

31. Regulation 2 of the Data Protection (Charges and Information) Regulations 2018 requires a data controller to provide certain information, and to pay a fee, to the Information Commissioner. On receipt of the fee, the Information Commissioner's Office ("ICO") will enter information about the data controller on the ICO's public register of fee-payers. Regulation 2 does not apply if all of the processing of personal data undertaken by the Data Controller is "exempt processing" within the Schedule to the 2018 Regulations.
32. GSB is a non-profit-making organisation. Its income is from members' subscriptions, performance ticket sales and donations. After deductions for running costs and to maintain a suitable reserve against future costs, GSB uses its net income (if any) to support such charitable causes as may be agreed by its committee. Processing of personal data by GSB is carried out for the purposes of establishing or maintaining membership or support for GSB, or providing or administering activities for individuals who are either a member of GSB or who have regular contact with it.
33. GSB therefore considers that its processing is "exempt processing" within paragraph 2(2)(g) of the Schedule to the 2018 Regulations and that its data controller is not required to comply with regulation 2.

### ***Data retention***

#### ***Regular Data Review***

34. A regular review of all data will take place to establish if GSB still has good reason to keep and use the data held at the time of the review. As a rule, a data review will be held every 2 years and no more than 30 calendar months after the last review. The first review under this new policy will take place on or after the second anniversary of its adoption.

#### ***Data to be reviewed***

35. Electronically-held and physically-held data, defined in para 5 above, processed by or on behalf of GSB or anyone involved in its activities.

### ***By whom the review will be conducted***

36. The review will be conducted by the GSB committee Chair or her delegate in consultation with other committee members to be decided on at the time of the review.

### ***How data will be deleted***

37. Deletion will be as follows:
- (a) Physically-held data will be destroyed safely and securely, including by shredding.
  - (b) All reasonable and practical efforts will be made to remove electronically-held data.
  - (c) Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
  - (d) Where deleting the data would mean deleting other data that GSB has a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

### ***Criteria***

38. The following criteria will be used to make a decision about what data to keep and what to delete.
- (a) Is the data stored securely?
    - (i) Yes: no action necessary.
    - (ii) No: update storage protocol in line with Data Protection policy.
  - (b) Does the original reason for having the data still apply?
    - (i) Yes: continue to use.
    - (ii) No: delete or remove data.
  - (c) Is the data being used for its original intention?
    - (i) Yes: continue to use.
    - (ii) No: either delete/remove or record lawful basis for use and get consent if necessary.
  - (d) Is there a statutory requirement to keep the data?
    - (i) Yes: keep the data at least until the statutory minimum no longer applies.
    - (ii) No: delete or remove the data unless GSB has reason to keep the data under other criteria.
  - (e) Is there any other legal requirement to keep the data – e.g. insurers' requirement in respect of a potential or actual legal claim?
    - (i) Yes: keep the data at least until the legal requirement no longer applies.
    - (ii) No: delete or remove the data unless GSB has reason to keep the data under other criteria.
  - (f) Is there reason to believe that an issue may arise in the future between GSB and an individual whose personal data is being kept?
    - (i) Yes: keep the data until the reason for the belief no longer applies.

- (ii) No: delete or remove the data unless GSB has reason to keep the data under other criteria.
- (g) Is the data accurate?
  - (i) Yes: continue to use.
  - (ii) No: ask the subject to confirm / update details.
- (h) Where appropriate does GSB have consent to use the data? This consent could be implied by previous use and engagement by the individual.
  - (i) Yes: continue to use.
  - (ii) No: get consent; otherwise delete or remove the data unless GSB has reason to keep the data under other criteria.
- (i) Can the data be anonymised?
  - (i) Yes: anonymise data.
  - (ii) No: continue to use.

### **Statutory Requirements**

39. Data stored by GSB may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:
- (a) Details of payments made and received (e.g. in bank statements and accounting records);
  - (b) Contracts and agreements with suppliers/customers;
  - (c) Insurance details;
  - (d) Tax and employment records.

### **Other data retention procedures**

#### *Member data*

40. When a member leaves Green Street Blues and all administrative tasks relating to the member have been completed, GSB will:
- (a) remove the member's name and contact details from future members' contact lists;
  - (b) delete the member's clothing sizes and measurements, bank details and financial data;
  - (c) delete the member's current details on GSB's website /social media (but not previous photographs of or including the member, or previous references to the member).
41. The Membership Secretary will retain the leaving member's name and contact details so that GSB may contact her in the event that an issue arises in relation to her time with GSB or, in appropriate circumstances, to update her about GSB's activities and to invite her to rejoin GSB. The continuing retention of this data will be considered in the regular two-year review.
42. Paragraphs 40 and 41 above apply to the Director of Music, except that GSB may be required by statute or HMRC to retain personal data for a longer period.

**Appendix 1**  
**Personal Data processed on GSB's behalf**  
**by Ticket Tailor and by Squareup Europe Ltd**

**Introduction**

1. This Appendix sets out how personal data is collected, held and used when a person:
  - (a) visits GSB's online event ticket shop, a facility provided to GSB by Zimma Ltd trading as "Ticket Tailor";
  - (b) makes a payment to GSB via the online event shop, a facility provided to GSB by Squareup Europe Ltd ("Square") as a payment processor partnered with Ticket Tailor, or
  - (c) makes a payment to GSB in person by payment card, which is also a facility provided to GSB by Square.
2. Ticket Tailor processes the personal data of individuals visiting the online event shop and also of those entering personal data to carry out transaction using the shop. Under Ticket Tailor's terms and conditions of the facility agreement made with GSB, Ticket Tailor processes that data as the data processor on behalf GSB as the data controller. Details of that processing are set out in the Privacy Policy below, which is compiled from information provided by Ticket Tailor, including in its "Privacy Policy Generator for Event Organisers".
3. Under the terms and conditions of GSB's service agreement with Square, some personal data in respect of card payments made via the online event ticket shop and card payments made in person are processed by Square as data processor on behalf GSB as the data controller. Square processes other personal data on its own behalf as the data controller. The data processed by Square on GSB's behalf comprises information that the payer would reasonably expect to be processed in making a purchase by card (name, address, contact details, card and account details and information provided by the paying financial institution in respect of the payment) and the payer already possesses the information. GSB processes this data solely for the purpose of the transaction and for its own financial record of it. For this reason, GSB does not provide a privacy notice at the time of the card payment transaction.
4. Processing of data by Square is described in detail in its online privacy notice at **<https://squareup.com/gb/en/legal/general/privacy-no-account>**.
5. Except as set out in this Appendix or in Square's privacy notice, GSB's Data Protection and Retention Policy continues to apply to data processed by Ticket Tailor and Square on its behalf.

# Green Street Blues

Women singing a cappella

## Privacy Policy – Ticket Tailor

1. Except where the context otherwise indicates, references below to “we”, “us”, “our”, etc, are to Ticket Tailor on behalf of GSB as the data controller.

### Personal data we collect

2. We collect, process, store and use personal data when you book a ticket and buy any of our associated products and services at our online event ticket shop, including your name, address and email address, together with payment information.
3. We may also collect personal data that you give to us about other people if you register them at our online event ticket shop to attend an event. You agree that you have notified any other person whose personal data that you provide to us of this privacy policy and, where necessary, obtained their consent so that we can lawfully process their personal data in accordance with this policy.
4. You do not need to provide us with any personal data to view our online event ticket shop. However, we may still collect the information set under the Data we Automatically Collect section of this policy, and marketing communications in accordance with the Marketing Communications section of this policy.
5. When you contact us by email or post, we may keep a record of the correspondence, and we may also record any telephone call we have with you.

### Data we automatically collect

6. When you visit our event ticket shop, we, or third parties on our behalf, automatically collect and store information about your device and your activities.
7. This information could include:
  - (a) your computer or other device's unique ID number;
  - (b) technical information about your device such as type of device, web browser or operating system;
  - (c) your preferences and settings such as time zone and language; and
  - (d) statistical data about your browsing actions and patterns.

We collect this data using cookies in accordance with the Cookie section of this policy. We use the data we collect on an anonymous basis to improve our online event ticket shop, our events and the products and services we provide, and for analytical and research purposes.

### Marketing Communications

8. It is necessary for our legitimate interests to use your personal data to send you marketing communications, which may include newsletters, blog posts, surveys and information about new events.

9. You can choose no longer to receive marketing communications by contacting GSB by email: the Chair at [gsbsingers@gmail.com](mailto:gsbsingers@gmail.com) or via GSB's website contact page: <https://greenstreetblues.org/>, or by clicking "unsubscribe" in a marketing communication. If you do unsubscribe to marketing communications, it may take up to 5 business days for your new preferences to take effect.

### **Lawful processing of your personal data**

10. GSB will use your personal data in order to comply with its contractual obligation to supply to you your tickets to an event and any associated products and services, including to contact you with any information relating to the event or your purchases, to deliver your purchases to you in accordance with any requests you make and that GSB agree to, and to deal with any questions, comments or complaints you have in relation to the event or your purchases.
11. We may also use your personal data for our legitimate interests, including dealing with any customer services you require, sending you marketing communications, enforcing the terms of any other agreement between us, for regulatory and legal purposes (for example anti-money laundering), for audit purposes and to contact you about changes to this policy.

### **Security**

12. We shall process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. All information you provide to us is stored on our secure servers. Any payment transactions are encrypted using SSL technology.
13. Where we have given, or you have chosen, a password, you are responsible for keeping the password confidential. However, you acknowledge that no system can be completely secure. Therefore, although we take these steps to secure your personal data, we do not promise that your personal data will always remain completely secure.

### **Who do we share your data with?**

14. We may share your personal data with any service providers, sub-contractors and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including payment providers, event ticketing providers, email communication providers, IT service providers, accountants, auditors and lawyers. A list of third-party sub-processors we use is on our website: <https://www.tickettailor.com/legal/gdpr-third-parties>
15. Under certain circumstances we may have to disclose your personal data under applicable laws and/or regulations, for example, as part of anti-money laundering processes or protect a third party's rights, property, or safety.

## **Where we hold and process your personal data**

16. Some or all of your personal data may be stored or transferred outside of the UK and the European Union (the EU) for any reason, including for example, if our email server is located in a country outside the UK or EU or if any of our service providers or their servers are based outside of the UK or EU. We shall only transfer your personal data to organisations that have provided adequate safeguards in respect of your personal data.

## **Retention**

17. If you register with us, we shall retain your personal data until you close your account.
18. If you receive marketing communications from us, we shall retain your personal data until you opt out of receiving such communications.
19. If you have otherwise booked a ticket or associated products and services with us or contacted us with a question or comment, we shall retain your personal data for 6 months following such contact to respond to any further queries you might have.

## **Cookies**

20. A cookie is a small text file containing a unique identification number that is transferred (through your browser) from a website to the hard drive of your computer. The cookie identifies your browser but will not let a website know your name and/or address. These files are then used by websites to identify when users revisit that website.
21. Our online event ticket shop website uses cookies so that we can recognise you when you return and personalise your settings and preferences. Most browsers are initially set up to accept cookies. You can change your browser settings either to notify you when you have received a cookie, or to refuse to accept cookies. Please note that our online event ticket shop may not operate efficiently if you refuse to accept cookies.
22. We also use Google Analytics to monitor how the online event ticket shop is used. Google Analytics collects information anonymously and generates reports detailing information such as the number of visits to the event ticket shop, where visitors generally came from, how long they stayed on the event ticket shop, and which pages they visited. Google Analytics places several persistent cookies on your computer's hard drive. If you do not agree to this, you can disable persistent cookies in your browser. This will prevent Google Analytics from logging your visits.

## **Your rights**

23. You have the right to obtain from us a copy of the personal data that we hold for you, and to require us to correct errors in the personal data if it is inaccurate or incomplete. You also have the right at any time to require that we delete your

personal data. To exercise these rights, or any other rights you may have under applicable laws, please contact GSB (details in para 9 above).

24. Please note, we reserve the right to charge an administrative fee if your request is manifestly unfounded or excessive.
25. If you have any complaints in relation to this policy or otherwise in relation to our processing of your personal data, please contact GSB. You may also contact the UK supervisory authority: the Information Commissioner, see [www.ico.org.uk](http://www.ico.org.uk).

### **General**

26. Our online event ticket shop may contain links to other sites of interest. Once you have used these links to leave our shop, you should note that we do not have any control over that other site. 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 policy. You should exercise caution and look at the privacy policy applicable to the site in question.
27. We may change the terms of this policy from time to time. You are responsible for regularly reviewing this policy so that you are aware of any changes to it. If you continue to use our online event ticket shop after the time at which we state the changes will take effect, you will have accepted the changes.