

Privacy Policy and Cookies Statement

Introduction

Broadwick Venues Limited (the **Company**) trading as East Wintergarden (the **Venue**) is committed to respecting your privacy. The purpose of this Privacy Policy is to explain how we will use any personal data we collect about you, the rights you have over any personal data we hold about you and to tell you about the policies and procedures that we have in place to respect your privacy and keep your personal data secure.

This Privacy Policy applies to you, the organisation you represent or to your customers (if your organisation is an actual or potential customer or supplier of ours (**you**), if you visit the Venue, purchase a ticket for one of our events or services at the Venue, or use our products or services at the Venue, over the phone, online, through our mobile applications or otherwise by using our website or interacting with us on social media (our **Services**) or supply products or services to us, or enter into an agreement with us.

Who are we?

The Venue is managed and operated by the Company. The Company is owned by Broadwick Group Limited and its subsidiaries (**Our Group**).

Our contact details

If you have any comments or questions about this Privacy Policy or our data processing practices, please address them to us at dpo@broadwicklive.com or send a letter to our Data Protection Officer, Broadwick Venues Limited, Acre House, 11/15 William Road, London NW1 3ER.

The categories of personal data we collect and use

The categories of personal data we collect and use include:

- name, address, email address, telephone number, gender, date of birth, age and/or age range;
- information about any device you have used to access our Services or the websites or mobile applications of other companies in Our Group or the websites of our ticketing partners or to access the public Wi-Fi service at the Venue (such as your device's make and model, device identifier, operating system, browser, MAC address or IP address);
- information about the pages or sections you have visited on the websites or mobile applications provided by us, the other companies in Our Group or by our ticketing partners, including the pages or sections you visited, the website or mobile application you were referred from, and when you visited or used them;
- information about the Services we provide to you (including for example, what we have provided to you, when and where and, if applicable, how much you paid);
- information about transactions you make with other companies for events and services at the Venue (including for example, what they have provided to you, when and where and, if applicable, how much you paid);
- bank account details and payment card information;
- location data (for example, if you use Wi-Fi at the Venue or our mobile applications at the Venue);
- your account login details, including your user name and password;
- information you provide to us with when you contact us by phone, email, post, or when you communicate with us via social media;
- information you provide to us about your health (for example when you are buying tickets for wheelchair accessible spaces, Covid-19 information, or when we are investigating an accident which may have happened at the Venue);
- CCTV images when you visit the Venue;
- information about electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication;
- answers you provide when you respond to competitions, votes and surveys;
- your identity, public profile, follows and likes from a social network; and

- other personal data which you may disclose to us when you use our Services at any time.

Sources of personal data

We will receive your personal data when you provide them to us yourself or when you use or purchase one or more of our Services.

We also receive personal data about you from third parties. Third parties who provide us with personal data about you include:

- our UK customers or their suppliers;
- ticket agents and others, who transfer personal data to us when you purchase a ticket and/ or other services from them for an event at the Venue;
- when you register for an event through your existing social media accounts. If you sign in through your social media account, we may get certain information (such as your profile name if register through your Facebook account) in accordance with your privacy settings on that social media site. You should read the privacy statements and check your privacy settings of those social media sites to learn how they treat your information, who, if you have consented, transfer personal data to us when you register for one of our Services using your Facebook account; and
- we might receive information about you from other third parties where you have agreed to them sharing your information with us for specific purposes (such as marketing).

We will combine any personal data about you that we receive from you, from other companies in Our Group, and from third parties.

How we use your personal data

All personal data that we obtain about you will be used in accordance with current data protection laws and this Privacy Policy. We, or third party data processors acting on our behalf, will process your personal data as follows:

- As necessary, to **perform a contract with you**, such as a contract to process an order from you for one or more of our Services including, where applicable, taking payment and carrying out fulfilment and delivery.
- As necessary, to **comply with a legal obligation**, for the following purposes:
 - where you exercise your rights under data protection law and make requests; and
 - to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity.
- As necessary, for our **legitimate interests** in providing the Services and ensuring they operate safely, securely and in a commercially suitable way which is tailored to your use and interests, for the following purposes:
 - to provide you with the Services;
 - to verify your identity for security purposes;
 - to help us to ensure our customers are genuine and to prevent fraud;
 - to ensure the security of our websites, mobile applications and other technology systems;
 - for the good governance of our business, including keeping financial records, to allow us to pay suppliers and to charge, invoice or refund customers;
 - by using CCTV, to prevent and detect crime and to keep people who visit and work at the Venue and safe and secure;
 - to record and investigate health and safety and other incidents which have happened or may have happened at the Venue;
 - to manage access to specific areas at the Venue;

- to provide you with information about our Services, to contact you about administrative matters, and to manage and respond to any queries or complaints you make or any correspondence you send us;
- to help us to return lost property to its rightful owner;
- to process your competition entries and your survey or voting information;
- for the purpose of marketing our Services and goods and services from other companies, including sending marketing communications and, where applicable, processing your registration, creating custom marketing audiences on third-party websites such as Facebook, and profiling and automated decision-making relating to our marketing;
- to “geo-fence” marketing so that you receive marketing communications or see advertisements which are relevant to your location;
- to operate competitions, including notifying you if you have won, to confirm delivery of a prize or for other related purposes; and
- for market research and statistical analysis and to analyse the use of our Services so that we can improve them.
- Based on **your consent**, for the following purposes:
 - to send you marketing communications.
- Based on **your explicit consent**, when you provide us with personal data about your health, for the following purposes:
 - to provide you with tailored services (for example, a wheelchair accessible space); and
 - to help us investigate an incident which may have taken place at the Venue.

If you win a competition, we may publicly post some of your data on our website or mobile application (for example acceptance of a prize may also require you (unless prohibited by law) to allow us to post publicly some of your personal data such as on a winners page). However, we will not post your data publicly without your express consent.

We will collect and aggregate on an anonymous basis information about you, your spending and use of our Services with information about other users of the Services in order to identify trends (“**Aggregated Data**”). We may pass Aggregated Data to the third parties referred to in the section below, such as partners, to give them a better understanding of our business and to bring you a better service. Aggregated Data will not contain information from which you may be personally identified.

Sharing your personal data

We will share your personal data with other companies in Our Group.

We will share your personal data with the data processors that help us to provide the Services. Any data processors with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for any purpose other than to provide services for us. We will always ensure that any data processors with whom we share your personal data are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

If you have consented, we will share your personal data with other trusted third parties, for example the artists or sponsors we work with, so that they can use your personal data for marketing or promotional purposes by sending you information about related products or service that may be of interest to you.

We will also disclose your personal data to third parties in the following circumstances:

- if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we (or substantially all of our assets) are acquired by a third party, in which case personal data held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;

- in order to enforce or apply our Terms of Use or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- to protect the rights, property, or safety of us, our customers or other persons. This may include exchanging personal data with other organisations for the purposes of fraud protection and credit risk reduction.

Save as expressly detailed above in this section, we will never share, sell or rent any of your personal data to any third party without notifying you and/or obtaining your consent.

How long do we keep your personal data?

We will normally retain your personal data for as long as you use our Services and for up to two years after your last use of our Services or your last interaction with us (for example, the last time you opened an electronic communication from us or visited one of our websites).

However, in some circumstances we will retain your personal data for a shorter period, including we will retain recorded CCTV footage at the Venue, unless we are required to retain it for longer (for example, if we are investigating an incident, or have been asked to retain specific CCTV footage for a longer period as required by law).

We will retain your personal data for longer if we believe we may need them in order to respond to any claims, to protect our rights or the rights of a third party, and we will retain your personal data for longer if we are required to retain them in order to comply with applicable laws.

We will always retain your personal data in accordance with data protection law and never retain your personal data for longer than is necessary.

Automated decision-making and profiling

We will combine any personal data about you that we receive from you, from other companies in Our Group, and from third parties in order to create marketing profiles.

Marketing profiles include personal data such as information about Services you have used or purchased previously, information about when you have visited the Venue in the past, demographic data and data from your social media profiles.

For example, we may analyse the personal data of people who have purchased tickets for a particular future event at the Venue and then compare them with other people in our database. If we identify people in our database who have similar personal data to the original purchasers, we may then target marketing about that event to the new people we have identified in our database, for example by sending direct marketing emails. We may conduct the profiling and send the direct marketing emails automatically.

We conduct these automated decision-making and profiling activities for our legitimate interests in providing the Services and ensuring they operate in a commercially suitable way which is tailored to your use and interests.

We will ensure that the automated decision-making and profiling does not produce legal effects concerning you or similarly significantly affects you.

Your rights

You may contact our Data Protection Officer at any time, to:

- request that we provide you with a copy of the personal data which we hold about you;
- request that we update any of your personal data which are inaccurate or incomplete;
- request that we delete any of your personal data which we are holding;
- request that we restrict the way that we process your personal data;

- request that we provide your personal data to you or a third-party provider of services in a structured, commonly-used and machine-readable format;
- object to us processing personal data based on our legitimate interests, including profiling; or
- object to us processing your personal data for direct marketing purposes.

Your request must include your name, email address and postal address and we may request proof of your identity. Please allow at least seven working days for us to process your request.

Withdrawing your consent

Where we are processing your personal data based on your consent, you may change your mind and withdraw your consent at any time.

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email or by adjusting the push message settings for the mobile application.

You can also withdraw your consent to receive marketing communications or any other consent you have previously provided to us by contacting us.

How do we protect your personal data?

We use industry standard technical and organisational security measures to protect your personal data. We keep your personal data secure by implementing policies, procedures and access controls so that only authorised members of our staff or authorised third parties can access your personal data. We protect our information technology systems with firewalls and anti-virus and anti-malware software and other information security technology solutions. When we transfer your personal data to third parties we use encryption.

We cannot guarantee the security of your personal data when you transmit it to us. For example, if you email us your personal data, you should be aware that email is not a secure transmission method. As such, you acknowledge and accept that we cannot guarantee the security of your personal data transmitted to us and that any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

Cookies

We use cookies and web beacons on our websites. Third parties also view, edit, or set their own cookies or place web beacons on our websites. Cookies and web beacons allow us and third parties to distinguish you from other users of the website.

Cookies and web beacons are used by us and third parties for the following purposes:

- to enable certain features of our websites (for example, to allow a customer to maintain a basket when they are shopping at an online store);
- to analyse the traffic to our websites (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, and use this information to improve the website);
- to help target advertisements which are more likely to be of interest to you;
- to allow us carry out retargeting (this is when advertisements are presented to you for products or services which you have previously looked at on a website, but have not purchased); and
- to allow you to interact with our websites on social media platforms.

The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Privacy Policy, except as required by law.

Changes to our Privacy Policy

We reserve the right to change our Privacy Policy from time to time. Any such changes will be posted on this page so that we can keep you informed about how we process your personal data. We recommend that you consult

this page frequently so that you are aware of our latest Privacy Policy and can update your preferences if necessary. Your continued use of our Services shall constitute your acceptance of any revised Privacy Policy.

This Privacy Policy and Cookies Statement was last updated on 9th January 2023.