

Website Privacy Policy for Raymond Gubbay Limited

At Raymond Gubbay Limited, we are committed to protecting the personal data that we obtain about you. The privacy and confidentiality of our customers and visitors to our website matter to us.

This Privacy Policy explains how we will process data relating to you that you provide to us (or that we may collect) when you visit our website at www.raymondgubbay.co.uk (**Website**).

The Website is operated by Raymond Gubbay Limited (**we, us, our, Raymond Gubbay**), a company incorporated in England & Wales with registered company number 02695143 and registered office at 2nd Floor, 1 Ely Place, London, Ec1N 6RY.

Where we decide the purpose and means for the processing of the personal data that you provide via our Website, we are the "data controller". As data controller, we will comply with all applicable data protection laws, including the EU General Data Protection Regulation 2016/679.

If you are thinking about purchasing merchandise or booking tickets for one of our events, we advise you to read this policy together with our Website Terms and Conditions. You can find the Website Terms and Conditions at www.raymondgubbay.co.uk/merchandise/terms-and-conditions.

Our Website may contain hyperlinks to third party websites, such as to our third party ticketing agents or payment service providers. These third party websites operate independently from us, and we cannot accept any responsibility or liability for the privacy practices of such third parties nor the availability of these external sites or resources. The appearance of such links on our Website is not an endorsement. Should you use any of these websites, such use is at your own risk and we would advise that you review their respective privacy policies.

1. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

When you visit our Website, we may collect and process the following information which may include your personal information.

Type of information	Purpose of the processing and legal basis for the processing	Who is this information shared with?
Visiting our Website		

<p>We may collect and store any personal information you provide when using the Website, including when you contact us by:</p> <ul style="list-style-type: none"> • telephoning or emailing our general 	<p>We may legally process the personal information that we collect on the basis that we have a legitimate interest and/or in the performance of a contract:</p> <ul style="list-style-type: none"> • to provide you with 	<p>We keep your information confidential. We will not sell your information. We may disclose your information to our personnel (including personnel in our group of companies) and to third party suppliers or</p>
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<p>enquiries department or emailing our press office or group bookings department</p> <ul style="list-style-type: none"> • sending us a communication via the post to our London office • submitting your email address to register for our newsletters and mailing list <p>Personal data that we may obtain includes:</p> <ul style="list-style-type: none"> • your name • your email address • your telephone number(s) • IP address • any other personal information that you may provide in a message that you send to us 	<p>information about the products and services that we offer, such as about upcoming music, dance and other cultural events as well as about the musicians, artists and performers we feature, or about how to book tickets for or parking at our events</p> <ul style="list-style-type: none"> • to perform our contract for sales of our products and services • to create and maintain your own account with us • to inform you about the collaborative and creative work we do with our coproduction teams to bring you award winning events combining state-of-the-art lighting and technical displays with performances by some of the world's most renowned orchestras and musicians • to respond to your enquiries • to manage risk or prevent other illegal or prohibited activities • to resolve issues or fix problems on the 	<p>subcontractors, such as:</p> <ul style="list-style-type: none"> • our event partners, who may include ticketing agents, the venue providers, and any other independent consultants involved in the organisation of our events • data analytics providers, cloudbased data processing and hosting providers <p>If we do share your information, we will only do so insofar as it is reasonably necessary for the purposes set out in this Privacy Policy, and provided that the recipients do not make independent use of the information.</p> <p>In some instances, this data sharing may involve the transfer of information outside the EU. Please see our section on International Data Transfers below.</p>
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	website	
Our Social Media Pages		

<p>This Website contains links to Raymond Gubbay’s social media pages on Facebook, Instagram, Twitter and YouTube.</p> <p>These third party social media websites have their own respective privacy policies (which we would advise you to read) for which those sites are solely responsible.</p> <p>Should you visit those social media pages and choose to follow us on Facebook, Instagram, Twitter or YouTube, Raymond Gubbay may receive personal information from the social media providers, including:</p> <ul style="list-style-type: none"> • your name (first and last) • your email address • your postal address • your telephone number(s) • IP address • location data • social media account url • your login details • your date of birth / age • your gender • your general interests 	<p>If we do receive any personal information about you from these third party social media sites, we will not process your information for the purposes of direct marketing unless you have provided your consent or it is otherwise lawful for us to do so.</p> <p>We may use this information to find out more about our digital community so that we can better understand and serve our customers and website visitors (for example, to create bespoke content by analysing general interests).</p> <p>If you have opted-in to receive such communications, please see our section below on “Our Approach to Marketing”.</p>	<p>We may share your personal information with these social media sites to enable them to provide targeted marketing messages where you have indicated your agreement to receive these messages from them or where it is otherwise lawful to do so.</p> <p>If you would like us to delete the personal information that we have received about you from these sites, please email us at: info@raymondgubbay.co.uk</p> <p>If you do not want us to receive further information about you from these sites, you should also contact the sites directly to turn off the ‘follow’ setting.</p> <p>If you would like to have deleted the personal data that you’ve shared with the social media accounts that you have joined or that you follow, please contact the social media providers directly.</p>
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Our Website Purchasing Platforms (e-shop for merchandise and ticket sales)

<p>Via our Website, we offer you the opportunity to:</p> <ul style="list-style-type: none"> • purchase music and other merchandise of our featured musicians and artists • purchase tickets to our featured concerts, performances and other cultural events <p>If you chose to make a purchase, we may collect and store any personal information you provide when making this transaction, including the following billing details:</p> <ul style="list-style-type: none"> • your name (first and last) • your email address • your postal address (billing address) • an alternative postal address (delivery address) (if applicable) • your country location • IP address 	<p>We collect and process your contact details to provide you with our products and services for which you have placed an order.</p> <p>We process this personal data in order to perform our sales contract with you (including the issuing of any refunds) and to meet our legal obligations or legitimate interests as a music and cultural events production and promotion business.</p> <p>Financial transactions via our e-shop are handled by our third party payment service providers, to which our Website will redirect you during the transaction.</p> <p>For purchasing merchandise, the payment services provider which we use is WorldPay.</p> <p>For ticket sales, we use a number of ticketing and payment processing providers including TicketMaster Entertainment, Inc. and See Tickets/Vivendi SA.</p>	<p>When you opt to make a purchase via our third party payment services providers, we will not share any personal information with them, nor will we receive any of the financial information that you provide to them.</p>
<p>Our Approach to Marketing</p>		
<p>Our Website does not contain third party advertising.</p> <p>We may collect information about you in order to send you our promotional or marketing communications, such as:</p>	<p>Where we provide you with information about our products, services, offers (such as via our e-newsletters or via our group bookings offers webpage) or if we contact you for market research purposes (such as surveys and feedback requests), we will</p>	<p>We will not share with any third party the personal information that we obtain about you for the purposes of marketing, except for as stated in this policy and only where those third parties have agreed to make no independent or further use of that data and</p>

<ul style="list-style-type: none"> • your name (first and last) • your email address • your telephone number(s) • any other personal information that you may provide in a message you submit to us <p>While we do not permit third party advertising (or targeted advertising) on our Website, if you do link to one of our Raymond Gubbay social media platforms you may be subject to targeted marketing via that site.</p> <p>For more about how our Website links to social media, please see our section above on "Our Social Media Pages".</p>	<p>only use your personal information in this way in accordance with laws relating to marketing directly to individuals, and in the pursuit of our legitimate interest of marketing our business.</p> <p>If you have asked to be added to our mailing list, we will provide your details to a third party company called Campaign Master (UK) Limited that helps us to produce and manage our newsletters. We provide these communications on the basis that you have asked to receive these.</p> <p>If you change your mind, you may opt-out at any time via the unsubscribe feature that appears in our emails or by emailing info@raymondgubbay.co.uk</p> <p>You may also be asked to opt in to receive updates or information about similar services from our event partners, which may include promotional material, vouchers or discount offers.</p> <p>Our event partners are our trusted network of creative industry and event organising businesses with whom we collaborate to deliver our concerts, festive trails and other cultural events.</p>	<p>to maintain its confidentiality.</p>
<p>Our Approach to Objectionable Content</p>		

If you send us objectionable content, or behave in a	We will only process personal information in this	Where we reasonably believe that you are or may
<p>disruptive manner when using our Website, we may process any personal information that you have submitted to us, including in your personal messages, to respond to and stop such behaviour.</p>	<p>way for the following legitimate interests:</p> <ul style="list-style-type: none"> • ensuring that the use of our Website is lawful; • ensuring that users do not disrupt or harass our staff, clients or other Website users; and • enforcing our legal rights and complying with our legal obligations. 	<p>be in breach of the law (i.e. the content you share on the Website amounts to harassment or is defamatory), we may use your personal information to inform relevant third parties about the content, such as:</p> <ul style="list-style-type: none"> • your email or internet provider; or • law enforcement agencies <p>Where we process personal information in this way, we will hold that personal information on our systems for as long as is reasonably necessary to achieve these objectives.</p>

2. DATA SHARING WITH OTHER PARTIES

In addition to the processing that we undertake ourselves, we also use third party processors to collect, export, store and otherwise process our data, include personal data, on our behalf. The processors that we engage include (without limitation):

- WorldPay (UK) Limited (CRN: 07316500) (Payment Services)
Location: EU (UK-based)
<https://business.worldpay.com/privacy>
- TicketMaster Entertainment, Inc. (Ticket Seller) Location: UK / US / globally
<https://www.ticketmaster.co.uk/legal/privacy.html>
- See Tickets / Vivendi SA (Ticket Seller) Location: EU (UK-based)
<https://www.seetickets.com/> (and click on "Data Protection" link)
- Facebook, Inc. (Social Media Platform)
<https://www.facebook.com/raymondgubbayltd/> Location: US
(EU-US Privacy Shield certified)
https://www.privacyshield.gov/participant_search

- Instagram (subsidiary of Facebook, Inc.) (Social Media Platform)
<https://www.instagram.com/raymondgubbayuk/?hl=en>
Location: US (EU-US Privacy Shield certified)
See above for Facebook, Inc. EU-US Privacy Shield certification link
- Twitter (Social Media Platform)
<https://twitter.com/raymondGubbay> Location: Ireland (for non-US customers) <https://twitter.com/en/privacy>
- YouTube (subsidiary of Google LLC) (Social Media Platform)
<https://www.youtube.com/user/raymondgubbay>
Location: US (EU-US Privacy Shield certified)
See Google Privacy Policy: <https://policies.google.com/privacy?hl=en-GB&gl=uk>
See Privacy Shield certification:
<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>
- Google LLC (for Google Analytics) (Web Management Tools)
Location: US (EU-US Privacy Shield certified)
See above for Google LLC privacy policy and Privacy Shield certification
- Campaign Master (UK) Limited (CRM Tools) Location: UK
<https://campaignmaster.co.uk/privacy-policy/>
- SurveyMonkey Europe UC and SurveyMonkey, Inc. (Survey Tool) Location: US (EU-US Privacy Shield certified)
<https://www.privacyshield.gov/participant?id=a2zt0000000Gn7zAAC&status=Active>

Additionally, when you purchase tickets for our concerts, performance and other cultural events, we also may share your personal data with the venue operators where the event is taking place.

3. **COOKIES & ANALYTICS**

Our Website uses cookies and other mechanisms to collect log and analytical information, to help analyse how visitors use the site, to personalise content, support our security function and to compile statistical reports on Website activity.

To find out more about the use of cookies generally, please visit the All About Cookies website at <http://www.allaboutcookies.org/>.

Our Website also uses website analytics, including Google Analytics, to evaluate and improve our Website, personalise your experience and to offer the best, most accessible service possible to all of our customers.

To find out more about Google Analytics and to learn how to opt out, please visit: •

[How Google uses data when you use our partners' sites or apps, or](#)

- <https://tools.google.com/dlpage/gaoptout/>.

When you visit our Website, these analytics service providers may collect the following data, which will almost always be anonymised and aggregated before reporting back to us:

- number of visitors to our Website
- pages visited while at the Website and time spent per page
- page interaction information, such as scrolling, clicks and browsing methods
- websites where visitors have come from and where they go afterwards
- page response times and any download errors
- date and time of the visit
- other technical information relating to end user device, such as IP address, access status/HTTP status code, your operating system and interface or browser plug-in

We process this information to understand how visitors use our Website and to compile statistical reports regarding that activity (for example, your IP address is used to approximate the country from which you access our Website, and we aggregate this information together so we know that, for example, whether most of the visitors to our Website come from the EU or from elsewhere).

This processing is crucial to the running of our online business and we therefore undertake such monitoring in the pursuit of our legitimate interests in improving our Website to provide a better service and source of information to visitors.

This information is not used to develop a personal profile of you.

4. **YOUR RIGHTS IN RELATION TO THE PERSONAL DATA THAT WE PROCESS**

You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest:

- to ask for a copy of data we are processing about you and have inaccuracies corrected;
- to ask us to restrict, stop processing, or to delete your personal data;
- to request a machine readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and
- to make a complaint to a data protection regulator. You may contact them at: <https://ico.org.uk/concerns/>

To make a request in relation to any of the aforementioned rights, please email us at info@raymondgubbay.co.uk.

If you are unhappy with the way that we are processing your personal data, please let us know. The best way to bring this to our attention is by emailing us at info@raymondgubbay.co.uk.

5. **CHILDREN**

We do not knowingly use the Website to solicit data from or market to children under the age of 13 or sell any of our products or services to children.

If a parent or guardian becomes aware that his or her child has provided us with information or may be receiving communications from us or has been otherwise interacting with us via our Website without consent of a parent or guardian, we ask that this be brought to our immediate attention. We will make it our priority to address this situation and delete information relating to a child as soon as practicable. In such an event, please contact us at info@raymondgubbay.co.uk.

6. **SECURITY**

We will take commercially reasonable, appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of our Website and services, taking into account the likelihood and severity those risks might pose to the rights and freedoms of our Website visitors.

In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal information transmitted, stored or otherwise processed by us.

Please be aware that, while we make the security of our Website and your personal information a high priority and devote considerable time and resources to maintain robust IT security, no security system can prevent all security breaches. When you choose to share your personal information with us, you accept the aforesaid and provide your information at your own risk.

7. **RETENTION**

In accordance with data protection laws and good commercial practice, we do not retain data in a form that permits identification of the person(s) to whom it relates for any longer than is necessary. Once the purpose for which information has been collected has been fulfilled, we will either permanently delete your personal information or remove all identifiers within it so that it is no longer personal data. We may use such anonymised data for research and/or business analysis purposes.

Where you have signed up to our newsletter mailing list, we will retain your details for as long as you remain on that list. If you unsubscribe, we will remove your details from the list.

Where we obtain your personal data in relation to the use or purchase of our services or products, including VAT or invoicing information, we are obligated by law to keep this for a minimum of 6 years.

If you would like us to stop using your personal information or restrict its use, please email us at info@raymondgubbay.co.uk.

8. **INTERNATIONAL DATA TRANSFERS**

Our servers are located in the European Union and the information that we collect directly from you will be stored in these servers. We may also transfer your personal data to our

third party service providers, many of whom may be located outside of the EU, operate from multiple locations including non-EU based operations or engage subprocessors located outside the EU.

There are agreements in place to ensure that any international transfers of personal data to our affiliates or third party service providers have appropriate safeguards that meet the requirements of EU data protection laws.

Such appropriate safeguards may include standard data protection clauses adopted by a data protection regulator and approved by the European Commission, such as the European Commission's standard contractual clauses. Alternatively, where personal data is transferred to the US, many of those US third party service providers are certified under the EU-US Privacy Shield framework approved by the European Commission.

To find out more about the standard contractual clauses, please visit:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outsideeu/model-contracts-transfer-personal-data-third-countries_en

To find out more about the EU-US Privacy Shield certification, please visit:

<https://www.privacyshield.gov/Program-Overview>

If you would like to find out more about these safeguards or about our international transfer of data, please let us know by emailing us at info@raymondgubbay.co.uk.

9. **CHANGES TO THIS POLICY**

This Privacy Policy may be updated from time to time. We will notify you of any changes to our Privacy Policy by posting the new version of this Privacy Policy on our Website. You are advised to consult this Privacy Policy webpage regularly for any changes.

10. **CONTACT**

Questions, comments and requests in relation to this Privacy Policy are welcome and should be addressed to info@raymondgubbay.co.uk.

Alternatively, you may address these to our Data Protection manager at Raymond Gubbay Limited, 2nd Floor, 1 Ely Place, London, Ec1N 6RY