

CHANGE MANAGEMENT LOG			
VERSION	DATE OF CHANGE	DETAILS	AUTHORISED
V3	29/01/2024	Amended to new template and document name. Previous versions can be found on BMS.	SB (Finance & Compliance Coordinator)
V4	17/06/2024	Review and language amendment, addition of policy references.	NH (Finance & Compliance Director)

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## 1. PURPOSE.

Stagestruck understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of our customers, employees, suppliers, and all other individuals we interact with. We will only collect and use personal information in ways that are described here, and in a way that is consistent with our obligations and your rights under the English law.

## 2. SCOPE.

This policy applies to:

- Customers and potential customers.
- Suppliers and service providers including freelancers and contractors.
- Visitors to our website.

## 3. WHAT DOES THIS POLICY COVER?

This policy contains essential information on:

- Who we are.
- What is Personal Data, How and why, we collect, store, use, and share your personal data.
- Your rights in relation to that data and how to contact us and supervisory authorities in the event of a complaint.

### 3.1 WHO WE ARE.

Stagestruck is an independent, fully integrated creative agency delivering world-class experiences, events, and communications for global brands anywhere in the world.

We are genuinely integrated and have in house all the relevant disciplines to provide our clients with creative concept development, project management, event design, video production, digital engagement, delegate management, set construction and technical support. Our clients benefit from ideas that push creative boundaries and reliable, exceptional quality, delivery.

We are registered with the Information Commissioners Office: ICO registration Z2135611.

Our Head Office contact details are: Stagestruck Ltd. Flint Hall, Anstey, Buntingford, SG9 0DN.

### 3.2 WHAT IS PERSONAL DATA?

Personal data is defined by the Data Protection Act 2018 (DPA), the UK General Data Protection Regulation (UK GDPR) and the EU General Data Protection Regulation (EU Regulation 2016/679) (collectively the "GDPR") as '*any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier*'.



Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as social media handles, IP addresses and other online identifiers.

The personal data that we process is set out below.

### 3.3 PERSONAL DATA WE COLLECT.

We collect, use, and share information about you in order to respond to your enquiries, to provide you with information related to your enquiry, and other services that may be of interest and to provide you with services and products you have asked for.

The information may include any of the following personal data: name, address, company, email address, telephone number, photographs, social media handles, IP address, payment information, voice recordings from telephone calls and recordings of virtual events/conferences.

To read more about additional information collected from visitors to our website please refer to section 8 of this policy 'Cookies'.

You may have provided this information directly to us through the following channels:

- Calling or visiting our offices.
- Speaking directly to us at an event.
- Participating in a virtual event we are hosting or facilitating or using the event chat facility.
- Writing to us.
- Emailing us.
- Social media.
- Visiting our website.

We may also receive your information from a third party e.g. product or service providers.

Sharing your information with us is essential for you to be able to communicate with us, for us to provide our services, to comply with contractual obligations and to keep you up to date with any changes and improvements to our products and services.

### 3.4 HOW WE USE YOUR PERSONAL DATA.

Under data protection laws, whenever we process your personal information, we must meet at least one set condition for processing. These conditions are set out in data protection law, and we rely on a number of different conditions for the activities we carry out.

We use your personal data in any of the following ways:

- To communicate with you.
- To provide our products and services to you.
- To keep you informed about the products and services you use from us, and to send information about products and services you may be interested in.



- To help us develop new and improved products and services to meet our customer's needs.
- For security and to check your identity to comply with legal and regulatory obligations.
- Where we have a legitimate business need such as the protection of our business interests.

## 3.5 SPECIAL CATEGORIES OF DATA.

We do not collect any data about you that falls under special category data. Special category data refers to information that includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences unless you are an employee and have given consent through our HR department.

## 3.6 WHO WE SHARE YOUR DATA WITH AND WHY?

We may share your information:

- Internally as required, for the purposes set out in this Privacy Policy, (e.g. customer relationship management and to provide you with any information, applications, products, or services that you have requested).
- With our service providers (including their sub-contractors) or third parties who process information on our behalf (e.g. internet service and platform providers, and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services, and information you have requested or which we believe is of interest to you.
- With partners, including system implementers, independent software vendors that may help us to provide you with the applications, products, services, and information you have requested.
- With third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions, and transaction beneficiaries.
- With third parties where you have a relationship with that third party, and you have consented to us sending information (for example third party application providers).
- With third parties for marketing purposes e.g. third parties we use to send you marketing communications
- With credit reference and fraud prevention agencies to protect our business interests.
- With regulators to meet our legal and regulatory obligations.
- With law enforcement agencies so that they may detect or prevent crime or prosecute offenders if required to do so by law.
- With any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order).
- With any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts.
- With our own and professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities.
- With another organisation if we sell or buy (or negotiate to sell or buy) any business or assets.
- With another organisation to whom we may transfer our agreement with you; and
- With Government departments where reporting is mandatory under applicable law.



We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties, but this will not include information that can be used to identify you. We always share your data securely, and we will not ever share more than we need to.

For transparency we have listed below the third parties we may share your data with, the purpose for sharing and a link to their privacy policy.

Name	Purpose	Privacy Policy
Ramsac	External IT support	<a href="https://www.ramsac.com/privacy-notice/">https://www.ramsac.com/privacy-notice/</a>
Microsoft Products & Teams	Office software and communication	<a href="https://privacy.microsoft.com/en-us">https://privacy.microsoft.com/en-us</a>
AWS	Access management	<a href="https://aws.amazon.com/privacy/">https://aws.amazon.com/privacy/</a>
QuickBooks	Accounting and payroll	<a href="https://quickbooks.intuit.com/uk/privacy-policy/">https://quickbooks.intuit.com/uk/privacy-policy/</a>
Google	Access management	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>
Adobe	Access management	<a href="https://www.adobe.com/uk/privacy/policy">https://www.adobe.com/uk/privacy/policy</a>
Vectorworks	Access management	<a href="https://www.vectorworks.net/legal/privacy-statement">https://www.vectorworks.net/legal/privacy-statement</a>
Auto desk	Access management	<a href="https://www.autodesk.com/company/legal-notices-trademarks/privacy-statement">https://www.autodesk.com/company/legal-notices-trademarks/privacy-statement</a>
Amazon	Access management	<a href="https://aws.amazon.com/privacy/">https://aws.amazon.com/privacy/</a>
Zoom	Access management	<a href="https://zoom.us/privacy">https://zoom.us/privacy</a>
Webex	Access management	<a href="https://www.cisco.com/c/en_uk/about/legal/privacy-full.html">https://www.cisco.com/c/en_uk/about/legal/privacy-full.html</a>
Current RMS	Bespoke Equipment Information	<a href="https://app.current-rms.com/privacy">https://app.current-rms.com/privacy</a>
Vidyo	Access management	<a href="https://www.vidyo.com/privacy-policy">https://www.vidyo.com/privacy-policy</a>
Lightyear	Accounting and payroll	<a href="https://lightyear.ai/privacy-policy">https://lightyear.ai/privacy-policy</a>
TeamTrack	Crewing Information	<a href="https://teamtrack.uk/privacy-policy/">https://teamtrack.uk/privacy-policy/</a>
Sign In App	Visitor names	<a href="https://signinapp.com/features/privacy/">https://signinapp.com/features/privacy/</a>

## 4. YOUR RIGHTS.

The GDPR aims to give you more control of your personal data. It provides new and strengthened rights. These are:

- **Right to access** – you can ask us whether we are processing your personal data, including where and for what purpose. You can also request an electronic copy of your personal data free of charge. If you require further copies of the data, there may be a charge permitted by the legislation.
- **Right to restrict processing** – in certain circumstances, you can ask us to restrict our use of your personal data.
- **Right to rectification** – you can ask us to correct inaccurate personal data we hold about you.
- **Right to erasure** (right to be forgotten) – in certain circumstances, you can ask us to erase your personal data.
- **Right to data portability** – you can ask us to provide you with a copy of your personal data in a commonly used electronic format so that you can transfer it to other businesses.



- **Right to object to automated decision-making** – in certain circumstances, you can ask us not to make automated decisions about you based on your personal data that produce significant legal effects.
- **Right to lodge a complaint** – you can lodge a complaint with the supervisory authority ICO, but we ask that you allow us to see if we can resolve the problem first (See complaints and queries section).

This means you can at any time:

- Inform us of a correction to your personal data.
- Withdraw any permission you have previously given to allow us to use your information.
- Object to any automated decision-making.
- Ask us to stop or start sending you marketing messages.
- Ask us to send you (or someone you nominate) a copy of the information we hold about you.
- Ask us to stop processing your information in **certain circumstances**.

## 5. HOW TO ACCESS YOUR PERSONAL DATA.

You have the right to request a copy of the personal data we hold about you and to have any inaccuracies corrected. This is known as a 'Subject Access Request or SAR'. We will require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

We will respond to your request within one month of you providing information that confirms your identity. If you can advise of the specific information that you require, we can process your request more quickly. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress. We will then give you a description of your data, why we have it, who it could be disclosed to and if you have requested copies, they will be in a format that you can access easily.

*If you wish to make a SAR request, please contact us using the contact details at the end of this notice.*

## 6. HOW LONG WE KEEP YOUR PERSONAL DATA.

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected or where required to under statutory record retention requirements.

We only retain information that enables us to:

- Maintain business records to comply with our contractual obligations.
- Comply with record retention requirements under the law.
- Defend or bring any existing or potential legal claims.
- Maintain records of anyone who does not want to receive marketing from us.
- Deal with any future complaints regarding services we have delivered.
- If required to by law enforcement agencies.



## 7. HOW WE PROTECT YOUR PERSONAL DATA.

We are committed to protecting your personal data. We take appropriate technical and organisational measures to guard against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. We are registered with the ICO and accredited with ISO 27001, creating, and adhering to an Information Security Management System.

We have security measures in place to restrict access to databases only to those who need access appropriate to their job role. All personal information and details provided as part of an enquiry, support or service request, or financial details are stored on secure servers. We do not store credit card numbers or related identifying information on any of our servers.

Digital data and hard copy data are securely disposed of when no longer required in line with our secure disposal of data process.

The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. However, please bear in mind that IT infrastructure and the internet cannot be guaranteed to be 100% secure.

## 8. COOKIES AND WHY WE USE THEM.

A “Cookie” is a small piece of information sent by a Web server to store in a Web browser so that it can later be read back from that browser. We may use cookies to store some personal preferences for your future visits. Cookies allow us to recognise you more quickly so your time spent on our site can be more personalised and productive. You will find that cookies are standard practice and are used at most major Web sites in much the same way we use them on the Stagestruck website.

We may use third-party site usage tracking companies to analyse your site visit or to conduct surveys e.g. Google Analytics. When visiting our website these third parties may place or recognise a unique “cookie” on your browser. These companies may use information (not your name, address, e-mail address or telephone number) about your visits to our website and other Web sites in order to help us understand how to serve you better. If you wish, you can prevent cookie files from using information about you by either deleting the cookie folder in your browser or by putting your browser’s Privacy setting higher, but doing so will mean that.

- Your use of the Site may be adversely affected (and quite possibly entirely prevented).
- Your experience of this and other sites that use cookies to enhance or personalise your experience will be adversely affected, and
- You will not be presented with advertising that reflects the way that you use our, and other, sites.

You can find out how to make these changes to your browser at this site:

[www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/)



## 9. HOW TO CONTACT US.

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. If you have a query about the way we are using or collecting your data or to make a Subject Access Request, please email our Privacy Manager at [privacy@stagestruck.com](mailto:privacy@stagestruck.com)

The supervisory body for the UK is the Information Commissioners Office (ICO).

You can visit their website at: <https://ico.org.uk/> or contact them on 0303 123 1113.

## 10. ADDITIONAL INFORMATION.

### 10.1 MONITORING AND REVIEW.

This policy will be reviewed annually or updated as per any necessary requirement.

### 10.2 FURTHER INFORMATION.

For any further information please contact the IT & Systems Manager.

