

# Privacy notice

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## 1. Introduction

This privacy notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

## 2. What is Edward Callow?

Edward Callow is a sole trader business providing services to the entertainment industries. It is not a limited company.

## 3. Which legal bases do we rely on?

The law on data protection, based on the General Data Protection Regulation and the Data Protection Act in the UK, sets out a number of different reasons for which a company may collect and process your personal data. These include:

### Consent

In specific situations, we can collect and process your data with your consent. This may be when you have ticked a box to receive regular communications from us in a paper or electronic document or on our website.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

## Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. If you have booked us to provide services to an event or production, then we will need your contact details for example.

## Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, if we have worked for you before we may use your address details to send you direct marketing information by post telling you about our services that we think may interest you.

## 4. When do we collect personal data?

We may collect personal data from you when you:

- visit our website
- make a booking
- engage with us on social media
- contact us by any means to make enquiries
- comment on or review our products and services

## 5. What sort of personal data do we collect?

Examples of the personal data we may collect include:

- your name, address, telephone number and email address
- details of your interactions with us
- copies of documents you provide us and signed contracts
- payment information
- your comments and reviews
- your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback

## 6. How and why do we use your personal data?

If you wish to change how we use your data, you'll find details below in section 11.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

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We'll use your personal data:

- to perform any contract we've agreed with you. If we don't collect your personal data during this process, we won't be able to provide the required services and comply with our legal obligations
- to respond to your queries or complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience
- to protect our business from fraud and other illegal activities. We'll do all of this as part of our legitimate interest
- with your consent, we will use your personal data to keep you informed by email, text and telephone about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on. *Of course, you are free to opt out of hearing from us by any of these channels at any time*
- to send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest. *You are free to opt out of hearing from us by post at any time*
- to send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations
- to develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests
- to send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you. *You are free to opt out of receiving these requests from us at any time by contacting us*

## 7. How do we protect your data?

We know how much data security matters to our clients. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it. Our computers and mobile devices are all password protected.

We regularly monitor our systems for possible vulnerabilities and constantly review our security.

## 8. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Her Majesty's Revenue and Customs (HMRC) requires us to keep records of contracts, payments and invoices for 7 years. We will therefore normally hold information of any contracts for this long.

## 9. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties. Circumstances may include:

- to have items delivered to site before an event
- if there are other performers or technicians booked by us as part of an event

Should it be necessary to share your data:

- we will provide only the information they need to perform their specific services
- they may only use your data for the exact purposes we specify in our contract with them
- we will work with them to ensure that your privacy is respected and protected at all times

## 10. Where will your personal data be processed?

Unless we inform you otherwise, your data will not be processed outside of the European Union.

## 11. What are your rights?

You have the right to request:

- access to the personal data we hold about you, free of charge in most cases
- the correction of your personal data when incorrect, out of date or incomplete
- the deletion of your personal data, for example when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty)

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- that we stop using your personal data for direct marketing (either through specific channels, or all channels)
- that we stop any consent-based processing of your personal data after you withdraw that consent

You have the right to request a copy of any information about you that we hold at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact us on [dpo@edwardcallow.co.uk](mailto:dpo@edwardcallow.co.uk). If we decide not to action your request, we will explain to you the reasons for our refusal.

### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

## 12. How can you stop the use of your data for direct marketing?

You can stop direct marketing communications from us by contacting us by telephone, email or post.

## 13. Contacting the regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (the ICO).

You can contact the ICO by calling 0303 123 1113 or visiting their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns). Please note we aren't responsible for the content of external websites.

If you are based outside the United Kingdom, you have the right to lodge a complaint with the relevant data protection regulator in your country of residence.

## 14. If you live outside the UK

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK. This may occur because our information technology storage facilities and servers are located outside your country of residence and could include storage of your personal data on servers in the UK. By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this privacy notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

## 15. Any questions?

We hope this privacy notice has been helpful in setting out the way we handle your personal data and that rights you have to control it.

If you have any questions that haven't been covered, please contact us on [dpo@edwardcallow.co.uk](mailto:dpo@edwardcallow.co.uk). We'll do everything we can to help.

This notice was last updated on 29 September 2020.