

## PRIVACY NOTICE

### Introduction

Please see below Kudos Roadshow's privacy notice.

Kudos Roadshow respects your privacy and is committed to protecting your personal data. This privacy notice will inform you how we look after your personal data when you visit our company websites (regardless of where you visit it from) and notify you about your privacy rights and how the law protects you.

This privacy notice aims to provide you the information on how Kudos Roadshow collects and processes your personal data through your use of our websites. Including any data you may provide through our websites when you interact with us. For example; by signing up to our newsletter via email, purchasing a product or service or participating in a company competition.

This privacy notice supplements the other notices and is not intended to override them - it ensures you are fully aware of how we use your data. Kudos Roadshow Limited is the data controller and responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details:

Kudos Roadshow Limited

Unit 10 Trade City Business Park

Cowley Mill Road

Uxbridge

Middlesex

UB8 2DB

Tel: +44(0)1896 207990

Email: [info@kudosmusic.co.uk](mailto:info@kudosmusic.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance to see if we can assist.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD PARTY LINKS

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave one of our websites through a third party link, we encourage you to read the privacy notice.

## THE DATA WE COLLECT ABOUT YOU

Personal data or personal information, means any information about an individual and or company can be identified from. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data;** includes your first name, last name, username or similar identifier, title, date of birth, if opening an account, passport number, driving licence or similar identification document as proof of identity together with a utility bill as proof of address.
- **Contact Data;** includes your billing address, delivery address, email address and contact numbers.
- **Transaction Data;** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data;** includes your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites.

- **Profile Data;** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data;** includes your information about how you use our websites, products and services.
- **Marketing and Communications Data;** includes your preferences in receiving marketing from us, our third parties and your communication preferences.
- **Aggregated Data;** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We **do not** collect any special categories of personal data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

## IF YOU FAIL TO PROVIDE DATA ABOUT YOU

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions;** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:
  - purchase or apply for our products or services
  - create an account on our websites
  - subscribe to our service or publications
  - request marketing to be sent to you
  - enter a competition, promotion or survey
  - give us some feedback
  
- **Automated technologies or interactions;** As you interact with our websites, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.
  
- **Third parties or publicly available sources;** We may receive personal data about you from various third parties as set out below:
  
- **Technical Data;** from the following parties:
  - Analytics providers such as Google based outside the EU
  - Advertising networks such as Quidco based inside the EU
  - Search information providers such as Google and Microsoft (Bing) based outside the EU.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal and Barclays based inside the EU.
  - Identity and Contact Data from lead generation campaigns run by third parties such as Awin, BPI and Barbour BP.
  - Identity and Contact Data from trade associations such as the Painting and Decorating Association based inside the EU.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## HOW WE PLAN TO USE YOUR DATA

- To register you as a new customer
- To process and deliver your order
- Manage payments, fees and charges
- Collect and recover money owed to us
- To manage our relationship with you
- Notifying you about changes to our terms or privacy policy
- Asking you to leave a review or take a survey
- To enable you to partake in a prize draw, competition or complete a survey
- To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
- To use data analytics to improve our websites, products/services, marketing, customer relationships and experiences
- To make suggestions and recommendations to you about goods or services that may be of interest to you

## HOW WE PLAN TO USE YOUR PERSONAL DATA

Which of the legal bases we rely on to do so.

We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

### *Marketing*

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising and we will always offer an 'opt out' option.

### *Promotional offers from us*

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### *Third-party marketing*

We will get your express opt-in consent before we share your personal data with any company other than Brewers for marketing purposes.

**Opting out;** You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

**Cookies;** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the relevant website may become inaccessible or not function properly.





**KUDOS ROADSHOW LTD**

**TEL: 01895 207 990**

**EMAIL: INFO@KUDOSMUSIC.CO.UK**

**WEBSITE: WWW.KUDOSMUSIC.CO.UK**

**UNIT 10, TRADE CITY BUSINESS PARK, COWLEY MILL ROAD, UXBRIDGE, UB8 2DB**

***Change of purpose;*** We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

***Disclosures of your personal data;*** We may have to share your personal data with the parties set out below;

- Our other trading divisions, but at all times we shall remain the data controller and your personal data shall only be used for the purpose we collected it.
- External Third Parties
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



## INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. For example;

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



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## TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Kudos Roadshow Limited

23 May 2018

