



## **VIVENDI LIVE GROUP**

### **PRIVACY POLICY**

#### **Introduction**

We respect your privacy and are committed to protecting your personal data. 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 notice is provided in a layered format so you can click through to the specific areas set out below.

- 1. Important information and who we are**
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#### **1. Important information and who we are**

##### **Purpose of the Privacy Policy**

This Privacy Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. We collect your data in the course of interacting with you in relation to various services which we, or our agents on our behalf, provide to you including but not limited to: if you attend any of our festivals or events from time to time; purchase a ticket for any of our festivals or events or any service or "bolt-on" which is sold by us or on our behalf; apply for a guest list or accreditation to attend our festivals or events; create an account with us via our mobile applications or other online platforms; subscribe to receive newsletters or updates from us about our festivals or events; request a brochure for our festivals or events; communicate with us in person, via our online platforms,

over the phone, via email or through our mobile applications or otherwise by using any of our websites or apps or interacting with us on social media (collectively, our “**Services**”).

This website is not intended for children and we do not knowingly collect data relating to children. Our corporate clients and suppliers are not data subjects and their data is not personal data for the purposes of this Privacy Policy, though their individual employees may be.

Please be aware that all job applicants will be issued with a separate Candidate Privacy Notice in relation to the data which we hold in connection with the application process. This Privacy Policy does not apply in respect of our processing of personal data in the context of our relationship with our employees who are issued with a separate Employee Privacy Notice.

It is important that you read this Privacy Policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

### **The Data Controller – Who we are**

Our group (the “**Vivendi Live Group**”) is made up of different legal entities which own and operate various festivals and events. The company within the Vivendi Live Group which owns or operates a festival or event will be the data controller responsible for the processing of personal data under applicable data protection law in connection with that festival or event and will control and be responsible for the website and any mobile applications which relate to that festival or event. The details of those group companies and the festivals/events for which they are the data controller and the websites which they control are set out below. Vivendi Live Limited either controls or holds an interest in the other named data controllers:-

<b>Data Controller</b>	<b>Festival/Event</b>	<b>Website</b>
Vivendi Live Limited	N/A	u-live.com
Company number: 00859087		
ULive Portfolio Limited	Le Crxssing and other events held under or related to the Le Crxssing brand	lecrxssing.com
Company number: 06861132	The Long Road and other events held under or related to The Long Road brand	thelongroad.com
	Kite Festival and other events held under or related to the Kite Festival brand*	kitefestival.co.uk
Love Supreme Festival Limited	Love Supreme and other events held under or related to the Love Supreme brand	lovesupremefestival.com
Company number: 07167313		
Nocturne Live Events Limited	Nocturne and other events held under or related to the Nocturne brand	nocturnelive.com
Company number: 08832956		

Sundown Festival Limited      Sundown and other events held      sundownfestival.co.uk  
under or related to the Sundown  
Company number: 06721466      brand

\*NB: Kite Festival is a joint venture operation which will be operated through a new joint venture company. Once the new joint venture company has been incorporated, ULive Portfolio Limited's ownership of any assets relating to the business of Kite Festival, including the customer database, will be assigned to the joint venture company and that entity will replace UPL as data controller in respect of the Kite Festival, Kite events and the Kite website.

This privacy policy is issued on behalf of the Vivendi Live Group so when we mention, "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Vivendi Live Group responsible for processing your data as set out in the table above.

### **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 [privacy@u-live.com](mailto:privacy@u-live.com) or address the letter for the attention of our Data Protection Manager **to the relevant company named above**, who can be contacted at 3 Pancras Square, London, N1C 4AG (for example, a letter in relation to Sundown would be sent to Data Protection Manager, Sundown Festival Limited, 3 Pancras Square, London, N1C 4AG). Please note a number of companies are located at this address so it is important you include the company name when writing to us to ensure we receive your letter.

### **Your details and any changes**

We need to ensure that the data that we hold about you is accurate and current. Please let us know if your personal data changes during your relationship with us.

### **Third Party Links**

We sometimes provide you with links to other websites or mobile applications, but these websites and mobile applications are not under our control. We are only responsible for the privacy practices and security of our Services. We are not responsible for the privacy policies, content or security of any linked websites or mobile applications. We recommend that you check the privacy and security policies of each and every website and mobile application that you visit.

In some instances, a third party may operate or host a competition on our website or mobile application, and collect your personal data. In those cases, where we are not the operator or host of the competition, we have no control over the personal data collected and accordingly urge you to review the third party's privacy policy before participating.

## 2. What data do we collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. 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 as follows:-

- **Identity Data** includes but is not limited to:-
  - first name, surname, date of birth, gender, username, location, or similar identifier;
  - CCTV images and/or bodycam images when you attend one of our festivals or events or visit us at our head office;
  - photographs of you in attendance at one of our festivals or events;
  - details of incidents in which you may have been involved at one of our festivals or events;
- **Contact Data** includes but is not limited to billing address and delivery address, home address, email address and telephone numbers;
- **Financial Data** includes but is not limited to bank details of any individual suppliers, freelancers or individual service providers and payment card information;
- **Transaction Data:** includes but is not limited to:-
  - details about payments to and from you;
  - 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 goods and/or services at our events or festivals which we are required to fulfil;
  - any prizes you have won from competitions we have operated;
- **Technical Data:** includes but is not limited to information about any device you have used to access our Services or our mobile applications such as your device's make and model, device identifier, operating system, browser, MAC address or IP address, time zone setting and location and other technology on the devices you use to access the Services;
- **Profile Data:** includes but is not limited to:-
  - your account login details, username and password for our mobile applications;
  - purchases or orders made by you and your preferences;
  - dietary requirements of which you inform us when you make a reservation at one of our festival restaurants;
- **Usage Data:** includes information about the pages or sections you have visited on the websites or mobile applications provided by us including the pages or sections you visited, the website or mobile application you were referred from and when you visited or used them, whether you have used a promotion so that the same promotion is not used twice;
- **Marketing and Communications Data:** includes
  - your preferences in receiving marketing data from us and (where applicable) your communications preferences;
  - information you provide to us with when you contact us by phone, email, post, or when you communicate with us online or via social media or communicate with us in person onsite at an event;

- 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 (where applicable);
- your identity (e.g. name, email address, location, gender, date of birth), posts, public profile, follows and likes from a social network such as Facebook and Twitter (this may include your employment or education information if you include it in your public profile);
- **Miscellaneous:** other personal data which you may disclose to us when you use our Services at any time or which we may collect about you in the provision of the Services (for example, details of any incident in which you may be involved at an event or festival or complaints which you may report).

From time to time we may also collect and use **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 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 Aggregate 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.

The only **Special Category of Personal Data** we collect about you is information you provide to us about your health (for example when you are buying tickets for accessible spaces or when we are investigating an accident which may have happened at festival or event or informing us about your dietary requirements). We do not collect details about your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic or biometric data. Nor do we collect any information about criminal convictions and offences, other than those offences committed or allegedly committed at one of our events or festivals where it is in our legitimate interests to do so and is in order prevent or detect an unlawful act where it is necessary in connection with any legal proceedings or prospective legal proceedings, to obtain legal advice, or is otherwise necessary for the purposes of establishing, exercising or defending legal rights.

### 3. How is your personal data collected?

Sources of personal data

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

- **Direct Interactions:** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email, social media, online, in person, by transacting with us or otherwise. This includes but is not limited to personal data you provide when you:-
  - sign up to our newsletter;
  - apply for disabled or specific needs access to one of our festivals or events or report an accident or injury at one of our events or provide us with details of your dietary requirements;

- purchase tickets for one of our events or festivals from us, please note that we do not receive any payment card details from our ticket agents in relation to purchases which you make with them;
- buy a bus ticket or a ticket from our onsite box offices or food and drink from the onsite restaurants which are operated by us or by our partners at our festivals in which case we will receive financial data from you;
- apply for a guestlist or accreditation at one of our events or festivals;
- request a corporate brochure;
- otherwise request marketing to be sent to you;
- enter a competition, promotion or survey;
- otherwise subscribe to our Services;
- download and login to our mobile applications;
- give us feedback or otherwise contact us such as to request information or make a complaint whether as an attendee or otherwise;
- provide details in person to a member of our onsite team about any occurrence at one of our events or festivals whether as an attendee or otherwise;
- complete one of our noise complaint forms;
- provide us with your plant licence or driver's licence where you are providing services to us onsite which require us to see proof of the such licences;
- complete our onsite induction as a supplier or service provider or are added to our radio database as part of the production team;
- have a problem with your ticket which features your name and which requires us to take a photograph of it to remedy the problem;
- provide your personal data to be added to our local resident database to receive complimentary tickets or to our volunteer and staff database;
- contact us as a supplier or service provider.

Where you give us personal data belonging to another person, including, without limitation, when signing up to a guestlist at one of our events or festivals, you must have the permission of that other person before sharing their data with us.

- **Automated technologies or interactions:** As you interact with our website we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using cookies, server logs, and other similar technologies. Please see our [Cookie Policy](#) for further details.

**We may also receive personal data about you from third parties and public sources as set out below.**

- Identity Data, Contact Data and Transaction Data from ticket agents such as See Tickets Limited and our sales agents for onsite restaurant bookings who transfer personal data to us when you purchase a ticket from them or book a restaurant session for our festivals and events;
- Technical Data from analytics providers such as Google;
- Contact and Transaction Data from providers of technical, payment and delivery services such as ticket agents;
- Identity and Contact Data from publicly available sources such as Companies House;

- Identity, Contact, Transaction and Usage Data from our business development agents in relation to corporate booking leads and enquiries and sponsorship leads and enquiries;
- Usage Data from email marketing service providers such as Mailchimp;
- Identity Data and (where applicable) Contact Data from our third party service providers such as external event security and medical teams in relation to incidents which take place at our festivals and venues in which you may be involved;
- Identity Data from third party photographers;
- Identity Data, Technical Data, Profile Data and Usage Data from Facebook Inc., Twitter or other social media platforms, where you contact us via social media or consent to them transferring personal data to us when you register for one of our Services using the relevant social media account;
- Identity Data, Technical Data, Profile Data and Usage Data from Facebook Pixel, and/or Google Adwords where we carry out advertisement targeting;
- Transaction Data from payment processing provider following processing of certain payments.

We may combine any personal data about you that we receive from you and from third parties.

#### **4. How do we use your personal data?**

All personal data that we obtain about you will be used in accordance with current data protection law and this Privacy Policy. We, or third party data processors acting on our behalf, will only use your personal data in the following circumstances:-

- 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 operating our business and providing the Services in a way that ensures they operate safely, securely and in a commercially suitable way which is tailored to your use and interests.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message or (where legally required) taking a photograph of you in which you can be identified at one of our events or festivals. You have the right to withdraw consent at any time by contacting [privacy@u-live.com](mailto:privacy@u-live.com).

We will not use any personal data which you provide to us or which we receive from third parties, including our ticket agents, to send direct marketing communications to you unless you have specifically consented to the same and the form of that consent meets all legal requirements.

With your explicit consent we process personal data about your health to provide you with tailored services such as disability and specific access services and to help us investigate an incident which may have happened at one of our events or festivals.

**Purposes for which we will use your data**

We have set out below, in a table format, the ways we, or our third party processors acting on our behalf, plan to process your personal data, and 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 at [privacy@u-live.com](mailto:privacy@u-live.com) 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

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To create and administer an account	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to administer the account).
To provide free guestlist and accreditation access to our festivals and events and verify your identity	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure we have the correct details for guestlist operation, to contact guest with details of any changes to the event and to protect the security and safety of our customers)
To fulfil your ticket order or contact you about an event for which you have purchased tickets	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for the effective operation of our business and to provide you with the best service)
To send you information which you have requested (e.g. corporate brochure or e-newsletters)	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for the effective operation of our business and to provide you with the best service)



PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To provide you with any other Services	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for the effective operation of our business and to provide you with the best service)
To enable us to pay suppliers and charge, invoice or refund customers (where applicable)	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for the effective operation of our business and to provide you with the best service)
Use of CCTV and/or bodycams to prevent and detect crime	(a) Identity	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to prevent and detect crime and to protect the safety and security of visitors to our festivals and events and those who work there)
Use of CCTV for investigations	(a) Identity	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to investigate health and safety and other incidents which have happened or have allegedly happened at our festivals and events, to provide evidence in the event of legal proceedings)
To investigate incidents or alleged incidents which take place at our festivals and events and complaints	(a) Identity (b) Contact (c) Miscellaneous	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to investigate illegal, health and safety and other incidents which have happened or have allegedly happened at our festivals and events and complaints, to provide evidence in the event of legal proceedings)

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
Photographs of crowds at our festivals and events	(a) Identity	(a) Necessary for our legitimate interests (to capture footage of artists performing at our festivals and events which feature crowd in the background or to record images of our festivals and events for showreel and marketing purposes)
To manage access to specific areas of our events and services	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to manage access to backstage or VIP areas) (a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep records of promoters of events at our festivals and events, contact them in connection with business matters and settle any sums due on the maturity of an event)
To manage our relationship with suppliers	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services, to provide a better service, to correspond with you where you have requested a response and obtain your feedback to improve our services, to resolve any disputes in the early stages to protect our business, to help us to return lost property to its rightful owner).
To manage our relationship with you which will includes: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Providing you with information about our Services (d) Contacting you about administrative matters (e) Managing and responding to any queries or complaints you make or correspondence you send us	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services, to provide a better service, to correspond with you where you have requested a response and obtain your feedback to improve our services, to resolve any disputes in the early stages to protect our business, to help us to return lost property to its rightful owner).
To verify your online identity for security purposes	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to prevent fraud)

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To enable you to partake in a prize draw, competition or complete a survey or review	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business, to confirm delivery of a prize, to improve our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant marketing communications to you in order to market our Services including, 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	(a) Identity (b) Contact (c) Technical (d) Financial (e) Profile	Necessary for our legitimate interests (in order to effectively market our Services and ensure they operate in a commercially suitable way which is tailored to your use and interests)
To deliver relevant website content to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To meet your dietary requirements when you attend one of our festival pop-up restaurants	(a) Identity (b) Profile	Performance of a contract with you

### 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.

You may receive marketing communications from us if you have opted in to receiving marketing when creating an account, buying a ticket for one of our festivals or events or other goods or services we may offer from time to time, requesting a corporate brochure, signing up to a newsletter, entering a competition or using any other of our Services.

We will send you communications relating to the event or festival which you interacted with or requested to hear from and, from time to time, if the Vivendi Live Group operates a similar festival or event or operates a festival or event in a similar location or operates a festival or event with a similar genre to the one you initially interacted with or requested to hear from we may send you details about that other festival or event. We will not share your data with the member of the Vivendi Live Group which operates or is the data controller in respect of that other festival or event for marketing purposes without your consent to do so.

### Third party marketing

We will get your express opt-in consent before we share your personal data with any company outside of the Vivendi Live Group for marketing purposes.

### 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 [privacy@u-live.com](mailto:privacy@u-live.com).

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.

## 5. How do we share your personal data?

We may share your personal data with other companies in the Vivendi Live Group where we are lawfully allowed to do so.

We will share your personal data with the data processors that help us to provide the Services. These include:-

- ticket agents who sell tickets and gather customer data on our behalf;
- email marketing and CRM system providers;
- marketing agents who provide marketing services in relation to the festivals and events, these entities may sometimes also be our shareholders;
- providers of analytics tools;
- internal email platform providers;
- external business development and sales agents;
- third party contractors (including security and event staff) in relation to any incidents in which you may be involved in respect of which they may have been involved or have witnessed;
- event staff who operate the festival and event box offices, guest list and accreditation access lists
- providers of document management systems and online document storage platforms;
- web hosting server providers;
- professional advisors including lawyers, business affairs consultants, bankers, auditors and insurers who provide consultancy, banking, legal, business affairs, insurance and accounting services;
- providers of advertisement targeting services;
- our payment processors who may be based outside of the EEA;
- HM Revenue and Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- our co-promoters, where necessary, so that they can help us to run the event for which tickets have been purchased, to fulfil the order, analyse customer behaviour, provide a better service and support to customers, and, with consent where required, for marketing.
- any externally appointed Data Protection Manager.

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

- 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 policy;
- 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

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.

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.

### **Automated decision-making and profiling**

Where you consent to your data being shared with us and used by us for marketing purposes we may combine any personal data about you that we receive from you, from other companies in the Vivendi Live 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 one of our festivals or events in the past or events you attended, 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 Vivendi Live Group festival or event 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, if we have their consent to do so, we may then target marketing about that event to the people we have identified in our database, for example by sending direct marketing emails (where we have consent to do so). 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 for commercially viable purposes which are 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.

### **6. Where do we transfer your data?**

Your personal data may be transferred to, and processed in a location outside of the European Economic Area (EEA).

Many of our external third party processors are based outside of the EEA so their processing of your personal data will involve a transfer outside the EEA.

Some countries outside the EEA do not have laws that protect your privacy rights as extensively as those in the United Kingdom. However, if we do transfer your personal data to other territories, we will put in place appropriate safeguards to ensure that your personal data are properly protected and processed only in accordance with this Privacy Policy. Those safeguards include imposing contractual obligations of adequacy or requiring the recipient to subscribe to or be certified with an 'international framework' of protection. You can obtain more information about the safeguards we put in place by contacting us at [privacy@u-live.com](mailto:privacy@u-live.com).

## **7. How long do we keep your personal data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including 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.

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. If you have any questions about our retention policy contact [privacy@u-live.com](mailto:privacy@u-live.com).

## **8. How do we protect your personal data?**

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.

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.

Where we have given you (or where you have chosen) a password which enables you to access one of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **9. What are your legal rights?**

You may contact our Data Protection Manager by email at [privacy@u-live.com](mailto:privacy@u-live.com) 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; or
- object to us processing your personal data for direct marketing purposes.

### **No fee usually required**

You will **not** have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

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.

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.

### **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.

### **Objection to legitimate interest processing**

Where you object to processing personal data based on legitimate interests we can continue to process such data if we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or where the processing is taking place for the establishment, exercise or defence of legal claims.



## **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.

You can also withdraw your consent to receive marketing communications or any other consent you have previously provided to us by contacting us at [privacy@u-live.com](mailto:privacy@u-live.com).

The consequence of you withdrawing consent might be that we cannot do certain things for you.

## **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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see Cookie Policy.

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.

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

Right to lodge a complaint with a supervisory authority

You may also make a complaint to a supervisory authority for data protection matters. In the UK, this would be the UK Information Commissioner's Office <https://ico.org.uk>. If you live in another EEA country, you may complain to the supervisory authority in your country. Alternatively you may seek a remedy through local courts if you believe your rights have been breached.

## **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 was last updated on 22 January 2020.