ES BROADCAST HIRE

PRIVACY POLICY

UNITED KINGDOM

ES Broadcast Hire Ltd. ("**we**", "**us**" or "**our**") is committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you or that you provide to us will be processed by us.

It is important that you read this privacy policy together with any other privacy notice or fair processing 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 policies and notices and is not intended to override them.

For the purposes of the Data Protection Act 2018 (the DPA), the UK GDPR (as section 3(10) of the Data Protection Act 2018, read with section 205(4) of that Act) and all successor legislation to the DPA and the GDPR (the "Data Protection Legislation"), the data controller is ES Broadcast Hire Ltd., a company registered in England and Wales with company no. 07976891 and whose registered office is at Unit H, Caxton Court, Caxton Way, Watford WD18 8RH. Within the EU, the data protection representative is ES Broadcast Hire Spain, SL, a registered company in Spain (CIF nº ESB88031869), registered at Registro Mercantil de Madrid, Tomo 37.305, Folio 57, Sección 8ª, Hoja M665219.

1 Information we collect from 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 (known as "anonymous data").

We may collect, use, store and transfer the following data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you set up an online account, order our goods or services, make an enquiry, subscribe to our services or publications, request marketing to be sent to you, when you report a problem with our site and when you give us feedback. The information you give us may include your title, name, address, e-mail address, phone number, Skype address, job title and company, username and password, financial and payment information, copies of your passport or other official identification documentation.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - o technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - o information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, abandoned shopping cart information, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive personal data about you from various third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers.

We may also collect, use and share 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. 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 policy.

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.

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.

2 Uses made of your information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal information

- to carry out our obligations arising from any contracts entered into between you and us or to take steps at your request before entering into any contracts;
- to comply with any legal obligations to which we are subject;
- where it is necessary for our or a third party's legitimate interests, including for the purposes of preventing fraud, except where such interests are overridden by your interests or fundamental rights and freedoms; or
- where you have provided your express opt-in consent.

3 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use 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 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 register you as a new customer and/or to set up an online account	Identity, contact details	(a) Performance of a contract with you or steps taken at your request before entering into any contract with you (b) Necessary to comply with a legal obligation
To process and deliver your order including: (a) Manage payments, fees and charges; (b) Collect and recover money owed to us; (c) Provide goods and/or services to you.	Identity, contact details, passport details	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary to comply with a legal obligation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy; (b) Asking you to leave a review or take a survey	Identity, contact details, and marketing preferences	(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 and to study how customers use our products/services)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity, contact details, usage data and marketing preferences	Necessary for our legitimate interests (to develop our products/services and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, contact details and technical data such as IP address	(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 website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity, contact details, technical data such as IP address, marketing preferences	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	Technical data such as IP address	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)
To send you updates about our services and products	Identity and contact details	Consent

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your identity, contact details, usage data, technical data and marketing preferences 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 products 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.

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

You can ask us or third parties to stop sending you marketing messages at any time 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.

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.

4 Disclosure of your information

We may have to share your personal information with the third parties set out below, or any other third parties notified to you, for the purposes set out in paragraph 3 above:

- Professional advisers including lawyers, bankers, auditors and insurers based in the UK.
- Regulators and other authorities who require reporting of processing activities in certain 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.
- Fraud prevention agencies.
- Any of our group companies.
- Service providers and sub-contractors including delivery partners, warranty providers and website designers.
- Finance providers.
- Credit reference agencies.
- Google Analytics, our analytics provider.
- Mailchimp, our marketing email platform.
- Paperless Post, our event invitations platform.

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.

5 International transfers

Many of our 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:

- Wherever possible, 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.
- Where we use certain service providers in countries that have not been deemed to provide an adequate level of protection for personal data by the European Commission, we will only transfer data where we are able to use specific Standard Contractual Clauses approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6 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.

However, the transmission of information via the internet and by email is never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site or provided to us by email; any transmission is at your own risk.

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.

7 Retention

We will only retain your personal information for as long as is necessary to carry out the purpose for which it was collected, 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.

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.

8 Your rights

Under the Data Protection Legislation you may be entitled to the following rights:

- Where you have provided your consent to the processing of your personal data for any purpose, you have the right to withdraw such consent at any time by contacting us at Unit H, Caxton Court, Caxton Way, Watford WD18 8RH or by email to bookings@esbroadcasthire.com.
- You can ask us to rectify any inaccuracies in the personal information that we hold about you.
- To request the erasure of personal information that we hold about you where there is no good reason for us to continue processing it, where you have successfully exercised your right to object to processing, where we may have processed you information unlawfully or where we are required to erase your personal data to comply with local law.
- To object to our processing of your personal data where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- To restrict our processing of your personal data (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- To request a copy of your personal data from us in a commonly used and machine-readable format or that we transmit your personal data to another data controller.
- Not to be subject to automated decision-making, including profiling, which has legal or other significant effects on you.
- To access information held about you. 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.

You can exercise any of the above rights at any time by contacting us at Unit H, Caxton Court, Caxton Way, Watford WD18 8RH or by email to bookings@esbroadcasthire.com.

9 Links to and from our site

Our site may, from time to time, contain links to and from the websites of our partners and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

10 Changes to your personal data

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.

11 Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

12 Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. Our cookie policy is available at https://esbroadcasthire.com/cookies

13 Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Unit H, Caxton Court, Caxton Way, Watford WD18 8RH or emailed to bookings@esbroadcasthire.com.

If you have any complaints relating to our privacy policy or our use of your personal data, please contact us at Unit H, Caxton Court, Caxton Way, Watford WD18 8RH or by email to bookings@esbroadcasthire.com.

You also have the right to make a complaint to your local regulator in relation to data protection issues. In the UK, the Information Commissioner's Office (ICO) is the relevant authority and further information can be found at www.ico.org.uk.

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