

# Spotlight Entertainments privacy policy

Revised May 2018

## CONTENTS

1. Introduction
2. What is Spotlight Entertainments?
3. Explaining the legal bases we rely on
4. When do we collect your personal data?
5. What sort of personal data do we collect?
6. How and why do we use your personal data?
7. How we protect your personal data
8. How long will we keep your personal data?
9. Who do we share your personal data with?
10. Where your personal data may be processed
11. What are your rights over your personal data?
12. How can you stop the use of your personal data for direct marketing?
13. Contacting the Regulator
14. If you live outside the UK
15. Any questions?

### 1 Introduction

This Privacy Policy 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 Spotlight Entertainments?

Spotlight Entertainments is a legal partnership with two partners, Chris Siddons and Marceline Siddons. It is not a limited company. Spotlight is an entertainment agency, facilitating contracts of employment between performers/associated entertainment service providers and clients. Our contact details are as follows:

Spotlight Entertainments  
Chantersell  
Nether Lane  
Nutley  
Sussex  
TN22 3LA

Tel. 01825 713213  
Email [info@spotlight-ents.biz](mailto:info@spotlight-ents.biz)

### 3 Explaining the legal bases upon which we rely

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

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 are a client, and have booked our performers or service providers to provide a performance or service, 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 my interest you.

#### 4 When do we collect personal data?

##### *Clients*

- When you contact us by any means to make enquiries
- When you make a booking
- When we collect feedback after a booking, or when you comment on or review our products and services.

##### *Artistes*

- *When you contact us with your details seeking work.*
- *When we contact you for details of your work, with a view to providing work for you.*
- *We may also store basic contact details regarding other performers where an artiste has recommended another artiste to us, or where we have acquired these details from the public domain (e.g. the artiste's own web site). No information or images will be used to promote an artiste without the artiste's consent.*

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

##### *Clients*

- For a booking or enquiry: your name and address and the name of other guests at the event if relevant to the enquiry, your requirements, event address and on site contact name, email, telephone and mobile numbers.
- Details of your interactions with us such as with our website, email and social media.
- Copies of documents you provide us or 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.

##### *Artistes*

###### *On registration with us:*

- Your name and address, email address, web site, telephone numbers and other relevant notes including for example your skills, acts and past work.
- Video, Audio, Images, marketing and technical information regarding your act(s)

###### *When we book you for a client:*

- Signed contracts
- Details on the bookings you do for us
- Copies of your Public Liability and other relevant insurance documents
- Payment information, including your bank details, which are also passed on to our bank for the sole purpose of processing payments.
- In certain circumstances, we will also need copies of the current passports of you and your co-performers, to comply with security policies of clients, or to assist in travel arrangements.

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

If you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

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.

Here's how we'll use your personal data and why:

- 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, web, text, telephone about relevant products and services including tailored promotions. 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 products and services. 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, 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 we protect your personal data

We know how much data security matters to all 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, mobile devices and servers are all password protected. When unattended, computers and servers are kept in an alarmed room. 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. For example, Her Majesty's Revenue and Customs (HMRC) requires us to keep records of contracts, payments and invoices for at least 7 years. We also store details of previous bookings for reference when assisting repeat clients with new enquiries (for example, to re-book a band which you booked for a previous event). We store Artiste details for as long as The Artiste is seeking work with us.

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

We sometimes share your personal data with trusted third parties. Circumstances may be as follows:

### *Clients*

Information will be shared with Artistes in order for them to fulfil the requirement of a contract, and additional requirements that you have communicated to us in the run-up to a booking

Information may be shared with venues and other service providers present at the event in order for us to provide an excellent level of service to you and ensure that your event goes smoothly

### *Artistes*

Information, videos, images and audio will be shared with Clients and potential clients in order to generate work for you and to provide information on the performances and service which you offer

Information, videos, images and audio will be made available on our web site, with your permission

Personal contact details and more sensitive information such as passport copies etcetera will only be given out with your express permission.

### *Artistes and Clients*

Where information is provided to a third party, it is provided on the understanding that it is to be used solely for the purpose for which it is provided. No rights are conferred to the recipient to use the information for any other purpose.

10 Where your personal data may be processed

Unless we inform you otherwise your data will not be processed outside the UK.

11 What are your rights over personal data

#### *An overview of 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 right to deletion, 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).
- 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 at **Spotlight Entertainments Chantersell Nether Lane Nutley Sussex TN22 3LA**. 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 (ICO).
- You can contact them by calling 0303 123 1113. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)
- If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

#### 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.

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. 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.

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 your rights to control it.

If you have any questions that haven't been covered, please contact us at:

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Chantersell

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01825 713213

[info@spotlight-ents.biz](mailto:info@spotlight-ents.biz)

**This notice was last updated on 21<sup>st</sup> May 2018**