



PRIVACY NOTICE

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We are Broadsword Event House Limited ("Broadsword", "us" or "we") with registered number 05893488 and address Unit 20 Gardner Industrial Estate BR3 1QZ. We have produced this privacy notice in order to keep you informed about our practices regarding the collection, use and disclosure of Personal Data which may be provided to us via our website, associated apps and other digital products we provide or collected through other means such as an online form, email, or telephone communication. In this notice "you" refers to any individual whose Personal Data we hold or process (other than our staff).

All handling of your Personal Data is done in compliance with applicable data protection legislation including the General Data Protection Regulation (EU) 2016/679 ("GDPR"), Data Protection Act 2018 and UK GDPR. For the purposes of this notice, "UK GDPR" means the GDPR as such regulation is adopted into the law of the United Kingdom pursuant to the European Union (Withdrawal Act) 2018 and as amended by the Data Protection Act 2018 and any successor regulation or law.

The terms "Personal Data", "Special Categories of Personal Data", "Personal Data Breach", "Data Protection Officer", "Data Controller", "Data Processor", "Data Subject" and "process" (in the context of usage of Personal Data) shall have the meanings given to them in applicable data protection legislation. "Data Protection Lead" is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer.

We will post details of any changes to our notice on our website to help ensure you are always aware of the Personal Data we collect, how we use it, and in what circumstances, if any, we share it with other parties.

Lawful basis on which we process your Personal Data

Under applicable data protection legislation, there must be a 'lawful basis' for the use of Personal Data.

- Personal Data we hold about you will be processed either because:
- the processing is necessary in order for us to comply with our obligations under a contract between you and us;
- the processing is necessary in pursuit of a "legitimate interest";
- the processing is necessary to comply with a legal obligation; or
- in certain limited circumstances because you have consented to the processing for specific purposes.

What are Broadsword's 'legitimate interests'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's Personal Data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of us processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest. If you would like to find out more about our legitimate interests, please contact anna@broadswordgroup.uk.

About our processing of your data



We might collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

Identity Data such as names, usernames or similar; marital status; title; date of birth; sex and gender.

Contact Data such as addresses; email addresses and telephone numbers.

Communication Data such as a record of any correspondence or communication between you and us.

Financial Data such as bank account and payment card information.

Transaction Data such as information about payments and details of purchases you have made.

Technical Data such as IP addresses; cookies; login data; browser info; time zone; location; browser plug-ins; operating systems; platforms and other technology on the device used to access this website.

Profile Data such as usernames; passwords; security answers; purchases/orders; interests; preferences; feedback and responses to surveys, blogs and messages.

Marketing and Communications Data such as your preferences about receiving communications from us or third parties.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data can be derived from your Personal Data but is not itself Personal Data as it cannot be used to reveal your identity. If Aggregated Data is ever used in combination with your Personal Data and becomes identifiable, it will be treated in accordance with this notice.

Broadsword Event House does not collect any **Special Categories of Personal Data** about you (such as details about race or ethnic origins, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic or biometric data) or any information about criminal convictions/offences.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
When you register with the website or our services	Identity Data Profile Data Contact Data	Performance of a contract with you Necessary for our legitimate interests (to obtain necessary information in order to provide our services)
When you update, cancel or amend your account details	Identity Data Profile Data Contact Data	Performance of a contract with you Necessary for our legitimate interests (for the purposes of providing our services to you)
When we deliver our services to you (including delegate management services for some of our events, such as the	Identity Data Profile Data	Performance of a contract with you Necessary for our legitimate interests (for running our



provision of entry control, name badges and other administration.)	Contact Data Financial Data Transaction Data Communication Data	business and to provide you with services requested)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey (c) When you submit a complaint	Identity Data Profile Data Contact Data Communication Data Technical Data	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use the services we provide)
To administer and protect our business, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	Identity Data Profile Data Contact Data Technical Data	Necessary for our legitimate interests (for running our business, provision of administration services, network security, to prevent fraud and in the context of a business reorganisation) Necessary to comply with a legal obligation
B2B Marketing and the use data analytics to improve the website, services, marketing, customer relationships and experiences	Identity Data Profile Data Contact Data Marketing & Communications Data Technical Data	Necessary for our legitimate interests (to send marketing materials and communications to existing and prospective clients, to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Sharing your information

We may disclose information to third parties in the following circumstances:

- We may work with other professionals and providers in providing and delivering our services to you, such as service technology providers.
- In order to enforce any terms and conditions or agreements for our services that may apply.
- If we are sub-contracting services to a third party we may provide information to that third party in order to provide the relevant services.
- We may disclose information to our group companies (as the case may be).
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime).
- As part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation.



- To protect our rights, property and safety, or the rights, property and safety of our users or other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If we do supply your Personal Data to a third party we will take steps to ensure that your privacy rights are protected and that such third party complies with the terms of this notice.

Data security - how we ensure the security of your data

Broadsword takes the security of Personal Data seriously. We have internal policies and controls in place to ensure that appropriate technical and organisational measures are carried out to safeguard information, protect Personal Data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not unlawfully accessed.

These measures may include (as necessary):

- protecting our servers by both hardware and software firewalls;
- locating our data processing storage facilities in secure locations;
- encrypting all data stored on our server with an industry standard encryption method that encrypts the data between your computer and our server so that in the event of your network being insecure no data is passed in a format that could easily be deciphered;
- when necessary, disposing of or deleting your data so it is done so securely;
- regularly backing up and encrypting all data we hold;
- ensuring our system has appropriate permissions set up to restrict access.

We will ensure that our employees are aware of their privacy and data security obligations. Where we engage third parties to process data on our behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Data Breaches

If Personal Data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO) as necessary.

If a breach is likely to result in a high risk to your data rights and freedoms, we will notify you as soon as possible.

We will record all data breaches regardless of their effect.

What happens if I refuse to give Broadsword Event House my Personal Data?

The information about you that we have collected for the performance of our contracts is required in order for us to successfully fulfil our obligations to you. If you choose not to provide the Personal Data requested, we will not be able to enter into a contract with you to provide the services we offer. If we are already processing your personal information under a contract, you must end our contractual relationship (as/where permitted) in order to exercise some of your rights.

What do we do with Cookies?



Our website uses cookies. A cookie is a small file of letters and numbers that is stored on your device when you visit a website.

Cookies are useful as they help us to provide you with a good experience when you browse our site, for example by storing your preferences and maintaining your shopping cart. They also help us to improve the site.

We are required to obtain your consent to use cookies.

We use the following types of cookie:

- a) **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website and to use a shopping cart.
- b) **Analytical/performance cookies.** These are used for analytics, for instance they allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. Some of these are third party cookies which analyse website usage.

On your first visit to our website from your browser we will display a banner to notify you that we are using cookies. We will only load the Strictly Necessary until you have clicked the "Accept" button on our cookies banner. If you click the "Accept" button our Analytical/performance cookies will be loaded.

You can block cookies by activating settings on the website browser that you are using. However, if you use the settings to block all cookies (including strictly necessary cookies) you may not be able to fully access all areas of our website.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org. If you would like to know exactly which cookies are set by us and/or which third party cookies we use, please contact us.

What profiling or automated decision making does Broadsword perform?

Broadsword does not perform any profiling or automated decision making based on your Personal Data.

How long will your Personal Data be kept?

Broadsword holds different categories of Personal Data for different periods of time. Wherever possible, we will endeavour to minimise the amount of Personal Data that we hold and the length of time for which it is held.

If we process your data on the basis of 'legitimate interests', we will retain your data for as long as the purpose for which it is processed remains active. We review the status of our legitimate interests every twelve (12) months and will update this notice whenever we determine that either a legitimate interest no longer exists or that a new one has been found.

All categories of Personal Data that are held by us because they are essential for the performance of a contract, will be held for a period of six years, as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.

The retention periods stated in this notice can be prolonged or shortened as may be required (for example if there is an on-going investigation into the data).



We review the Personal Data (and the categories of Personal Data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.

If you wish to request that data we hold about you is amended or deleted, please refer the section below which explains your privacy rights.

Your privacy rights

Your privacy rights

You have the following rights in respect of Personal Data we hold about you:

The right to be informed	You have a right to know about our Personal Data protection and data processing activities, details of which are contained in this notice.
The right of access	You can make what is known as a Data Subject Access Request (“DSAR”) to request information about the Personal Data we hold about you (free of charge, save for reasonable expenses for repeat requests or complex requests). If you wish to make a DSAR please contact us as described below.
The right to correction	Please inform us if information we hold about you is incomplete or inaccurate in any way and we will update our records as soon as possible, but in any event within one month. We will take reasonable steps to communicate the change to any third parties to whom we have passed the same information.
The right to erasure (the ‘right to be forgotten’)	Please notify us if you no longer wish us to hold Personal Data about you (although in practice it is not possible to provide our services without holding your Personal Data). Unless we have reasonable grounds to refuse the erasure, on receipt of such a request we will securely delete the Personal Data in question within one month. The data may continue to exist in certain backup, but we will take steps to ensure that it will not be accessible. We will communicate the erasure to any third parties to whom we have passed the same information.
The right to restrict processing	You can request that we no longer process your Personal Data in certain ways, whilst not requiring us to delete the same data.
The right to data portability	You have right to receive copies of Personal Data we hold about you in a commonly used and easily storable format (please let us know a format which suits you). You may also request that we transfer your Personal Data directly to third party (where technically possible).
The right to object	Unless we have overriding legitimate grounds for such processing, you may object to us using your Personal Data if you feel your fundamental rights and freedoms are impacted. You may also object if we use your Personal Data for direct marketing purposes (including profiling) or for research or statistical purposes. Please notify your objection to us and we will gladly cease such processing, unless we have overriding legitimate grounds.
Rights with respect to	You have a right not to be subject to automated



automated decision-making and profiling	decision-making (including profiling) when those decisions have a legal (or similarly significant effect) on you. You are not entitled to this right when the automated processing is necessary for us to perform our obligations under a contract with you, it is permitted by law, or if you have given your explicit consent.
Right to withdraw consent	If we are relying on your consent as the basis on which we are processing your Personal Data, you have the right to withdraw your consent at any time. Even if you have not expressly given your consent to our processing, you also have the right to object (see above).

You can exercise your right to access Personal Data held about you by emailing anna@broadswordgroup.uk with the subject line: "Data Subject Access Request". When you submit a DSAR you will need to provide confirmation of your identity by contacting us using the email address associated with your profile. This is provided free of charge and our response will be made within thirty (30) days, unless our Data Protection Lead deems your request as being excessive or unfounded. If this is the case, we will inform you of our reasonable administration costs in advance and/or any associated delays, giving you the opportunity to choose whether you would like to pursue your request. If you believe we have made a mistake in evaluating your request, you have the right to lodge a complaint in accordance with the section "Contact Us".

International data transfers

There will be circumstances in which certain Personal Data is transferred outside of the UK or EEA, in particular:

- From time to time, some of our data processors (such as third party payment processors or hosting server providers), may be based outside of the UK or EEA. In that case, we will ensure we have an agreement in place with such processors to provide adequate safeguards and a copy of such safeguards will be available on request.
- If you use our site while you are outside the UK or EEA, your information may be transferred outside the UK or EEA in order to provide you with our services.
- We may communicate with individuals or organisations outside of the UK or EEA in delivering our services (for instance if the project is based outside of the UK/EEA) and those communications may include Personal Data (such as contact information).
- From time to time your information may be stored in devices which are used by our staff outside of the UK or EEA (but staff will be subject to our cyber-security policies).

If we transfer your information outside of the UK or EEA and the third country or international organisation in question has not been deemed by the EU Commission or Secretary of State (as the case may be) to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice. If you would like to obtain details of the safeguards we have put in place then please contact us.

Contact us



If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your Personal Data or how it is handled, you can do so by contacting our Data Protection Lead at anna@broadwordgroup.uk.

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner's Office by visiting <http://www.ico.org.uk/> for further assistance.