

# **Privacy Notice**

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This notice was last updated on 1<sup>st</sup> January 2022, and complies to the UK GDPR, underpinned by the UK law the Data Protection Act (2018), additional relevant data protection legislation and is regulated by the UK Information Commissioners Office (ICO).

## Scope & Responsibilities

Our scope is any data subject, whose personal data is collected, in line with the requirements under The Data Protection Act (2018) and UK GDPR.

Invenue must adhere to the three main data processing principles of processing personal data – lawfully, fairly and in an open and transparent manner. Invenue has further responsibilities with regards to controlling and processing personal data, which fall under the responsibility of our Data Protection Officer (DPO).

All associates and employees of Invenue who interact with data subjects are responsible for ensuring that this privacy notice is drawn to the data subject's attention.

#### Who we are

The invenue Network is a network of venue consultants and professionals. We support venues and venue people by introducing venue operators and stakeholders to expert independent guidance and advice.

Invenue is registered in England and Wales, under company registration number 13233667.

Invenue collects and processes certain personal information about you, when we do so we are regulated under the UK General Data Protection Regulation, which is underpinned by the Data Protection Act (2018).

We are responsible as the data controller & data processor (UK GDPR Articles 24-30) for all personal information collected for the purposes of those laws. The Data Protection Officer (DPO) is Caspar Norman.

Invenue can be contacted via email *info@invenue.uk* or by phone on 0333 344 3630.

#### What information we collect about you

The personal data you have provided, or we have collected from you, includes but is not limited to:

- Names and, contact details (e.g., Contact name, email address, telephone number)
- Addresses (e.g., collection/delivery and/or invoice addresses)

Lawful bases for processing of personal data:

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever Invenue processes your personal data:



- **Contract** the processing is necessary for Invenue to fulfil the obligations of an agreement, contract, or service level agreement (SLA) for the provision of confidential document management and/or data protection support. Both parties would be provided with a signed copy of the contract and a copy of this privacy notice.
- Legitimate Interests the processing is necessary, as Invenue has ascertained the legitimate interest of the individual/organisation and explained why the processing of personal data is required to action the legitimate interest. Invenue reviews our legitimate interest to hold personal data annually.

## How we use your personal information

Invenue uses your personal information:

- To pre-qualify which of our services are suitable for your requirements (e.g., responding to website contact forms, email requests for information).
- To communicate with you, via official invenue communication channels, to fulfil the objectives as outlined in the contracts.
- To facilitate client and prospect meetings, either electronically via video call (e.g., Microsoft Teams and Zoom), or to arrange meetings at client or other nominated premises.
- To provide client after care and client support (e.g., obtaining feedback, contract renewal)
- To keep you informed of any invenue company updates, new services, and new features.
- To produce invoices and receipts for our service (e.g., VAT invoices, receipts, Direct Debit mandates).
- To provide compliance with all legal requirements of England & Wales.

## Who we share your personal information with?

Where relevant, we may also share your personal data with the following categories of third parties:

- Trusted partners who work alongside Invenue on contracts.
- Third party contractors, who carry out services, on behalf of Invenue. The relevant disclosure of this contractor would be made prior to accepting an order for Invenue services and the relevant contract/data processing agreement/duty of care put in place.
- Third party service providers who support the operation of our business, such as our IT suppliers.

Invenue will share personal information with law enforcement or other authorities if required by applicable law.

#### Whether information must be provided by you, and if so, why?

The provision of certain personal data including (but not limited to) contact name, email address & telephone number is required from you. This enables Invenue to provide our services to you.

We will inform you at the point of collecting information from you, whether you are required to provide this and any other additional information to us.

## **International Data Transfers**

Invenue does not control, process, or transfer personal data outside of the UK.



Should this situation change, Invenue would issue a company update via our official communication channels to all affected parties. If the international data transfer would fall within the European Union/EEA, data would be able to flow freely under the 'Adequacy Decision' agreed between the UK and European Parliament on June 27th, 2021. If the international data transfer is outside the EU/EEA/UK then appropriate safeguards would be put in place, such as a data impact assessment and risk assessment.

This Privacy Notice would also be updated.

## How long will your personal information be kept?

- We will retain your personal information for several purposes, as is necessary to allow us to carry out our business in accordance with our contract or legitimate interests and is necessary for compliance with our legal obligations.
- Any retention of personal data will be carried out in compliance with legal and regulatory obligations and with industry standards. These data retention periods are subject to change without further notice because of changes to associated laws or regulations.
- Your information will be kept for up to 7 years after the completion of the contract on our main systems, after which time it will be archived, deleted, or anonymised depending on the content of the material and whether there is any continuing need for it to be retained. For example, some of the archived information may be retained for a further period to allow us to process your existing or future instructions.
- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator (e.g., ICO) of a suspected data security breach where we are legally required to do so. Cookies

We use cookies to collect, store and share bits of information about your activities when you use our website. Cookies do different things, like letting you navigate between pages quickly and generally improving your experience of a website. If a website does not use cookies, it will think you are a new visitor every time you move to a new page on the website – for example, when you enter your login details and move to another page it will not recognise you and it will not be able to keep you logged in.

Invenue only use non-personal data essential cookies on this website to track the performance of the website via Google Analytics. This non personal data helps us to understand how to improve the website content for the benefit of all users. If you want to block cookies, then you can do this through your browser via the help function.

## Your rights



Under the UK GDPR, Data Protection Act (2018) and ICO guidance you have several important rights free of charge.

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.

If you would like to exercise any of those rights, please:

- call, email, or write to us in the first instance.
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates?

#### How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data. The <u>UK General</u> <u>Data Protection Regulation</u> also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioners Office (ICO) who may be contacted <u>here</u> or by telephone on 0303 123 1113.

#### Changes to this privacy notice

This privacy notice was last reviewed and published on 1<sup>st</sup> January 2022.

We may change this privacy notice from time to time, when we do, we will inform you via our company website.

#### How to contact us

Please contact us if you have any questions about this privacy notice or the information, we hold about you. The Data Protection Officer (DPO) is Caspar Norman.

If you wish to contact us, please send an email to *info@invenue.uk* or call 0333 344 3630.

Invenue Ltd, trading as invenue, is a company limited by guarantee registered in England and Wales. Company number 13233667. Registered office: 10 Bath Road Swindon SN1 4BA.



Dated: 1<sup>st</sup> January 2022