Hollywood Comedy Club

Privacy Policy

HOLLYWOOD COMEDY CLUB is committed to protecting your privacy at all times.

Policy Aims

This policy sets out how HOLLYWOOD COMEDY CLUB uses and protects the personal data that you provide to us.

This policy and relevant procedures aim to ensure that HOLLYWOOD COMEDY CLUB has effectively prepared for and is compliant with the General Data Protection Regulation (GDPR) which will apply from 25 May 2018.

We will treat any personal information collected, in accordance with this policy, the GDPR 2018, the data protection act of 1998, and the privacy and electronics regulations of 2003.

The policy applies to members, non-members, tenants, employees and anyone who uses our services.

Implementation of the Policy

HOLLYWOOD COMEDY CLUB already strictly adheres to the requirements of the UK Data Protection Act 1998.

The information we hold

HOLLYWOOD COMEDY CLUB records what personal data it holds, where it comes from and with whom it is shared through its database.

HOLLYWOOD COMEDY CLUB only collects the personal data that it needs, specifically.

- Name, address, email address, and payment information.
- Data in connection with specific activities to include registration, placing an order, conducting research or surveys, volunteering.
- Images, personal descriptions and opinions, collected on request.
- Technical information to include information on how visitors use our website to help us develop and improve our website:
- Technical information, including internet protocol (IP) addresses, log in information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- Information about your visit including click stream to, through and from our website, products you viewed
 or searched for, page response time, length of visits to certain pages, interaction information, the website
 visited before the HOLLYWOOD COMEDY CLUB website. HOLLYWOOD COMEDY CLUB uses Google
 Analytics to collect but not share this information.

HOLLYWOOD COMEDY CLUB does not obtain, hold nor process data with, from or about children and young people under the age of 18.

Using your information

HOLLYWOOD COMEDY CLUB will only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May-2018) UK Data Protection Act and privacy of Electronic Communication Regulation.

The collection of personal data is used by HOLLYWOOD COMEDY CLUB for three reasons.

- To help us administer, analyse and enhance our services
- To enable us to generate, process and complete revenue from the website

HOLLYWOOD COMEDY CLUB will not sell or otherwise transfer your information to other parties, except for electronic mailing houses to enable us to send you electronic publications.

Your involvement with us will result in personal data being created.

Information gathered includes demographic data and browsing patterns but is only collected in aggregate form, no individual user is identified. This is used to identify information needs, audit usage of the site, and build up profiles.

If asked by the police, or any other regulatory or government authority investigating suspected illegal activities we may need to provide your personal data.

If you are employed by us we may collect extra information about you (references, criminal checks, medical conditions) etc. This information will be retained for legal or contractual reasons, to protect us (including in the event of an insurance or legal claim), and for safeguarding purposes.

We will not sell, distribute or pass your personal information to third parties except in accordance with this policy or when requested to do so by law.

If we do use a third party to capture some of our data on our behalf, for example, survey or research purposes, we would only do so if confident that they would treat your data securely, in accordance with our terms and conditions and in line with the requirements set out in the GDPR.

Cookies

Cookies are small pieces of information stored by your internet browser onto your computer's hard drive. When you enter a site your computer will automatically be issued with a cookie. HOLLYWOOD COMEDY CLUB uses cookies to make a link between you and the information you have provided on our website. Cookies do not identify the individual user, just the computer used. Cookies themselves only record those areas of the site that have been visited by the computer in question and for how long. Users have the opportunity to set their computers to accept all cookies, to notify them when a cookie is used, or not to use a cookie at any time. If you disable cookies then certain personalised services will not be available to you.

Storage of your personal information

HOLLYWOOD COMEDY CLUB will hold your personal information on its secure systems for as long as you use the services you have requested, and remove it in the event that the purpose has been met, at your request.

Communicating privacy information

HOLLYWOOD COMEDY CLUB will ensure its privacy notice is available to all. HOLLYWOOD COMEDY CLUB will regularly refresh its privacy policy in line with future legislation.

Individual's rights

HOLLYWOOD COMEDY CLUB respects and ensures procedures are correctly in place to cover the rights of individuals as follows

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- The right not to be subject to automated decision-making to include profiling

If at any point you believe the information we possess on you is incorrect you can request to see this information and have it corrected or deleted. You also have the right to be told how your personal information will be used. This section along with the data protection policy is designed to give you clear understanding of how your data is stored and used by us.

- For more information about your rights please consult the Information Commissioner's guidance at, <u>https://ico.org.uk/for-organisations/guide-to-thegeneral-data-protection-regulation-gdpr/individual-rights/</u>
- Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time.
- If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated.

Subject access requests

You have the right to request a copy of the personal information HOLLYWOOD COMEDY CLUB holds about you and to have any inaccuracies corrected. HOLLYWOOD COMEDY CLUB will comply with your request within one month.

Other Websites

Other websites linked from HOLLYWOOD COMEDY CLUB's domain are not covered by this privacy statement.

Payments

Payments made on our website are handled by Wix. We recommend that you read their privacy policies before making a payment.

HOLLYWOOD COMEDY CLUB reserves the right to change our service providers without prior notice. Please check this page regularly for updates.

Data Protection by design and Data Protection Impact Assessments HOLLYWOOD COMEDY

CLUB will carry out a Data Protection Impact Assessment if it ever

- Uses systematic and extensive profiling or automated decision-making to make significant decisions about people.
- Processes special category data or criminal offence data on a large scale.
- Systematically monitors a publicly accessible place on a large scale.
- Uses new technologies.
- Uses profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit.
- Carries out profiling on a large scale.
- Processes biometric or genetic data.
- Combines, compares or matches data from multiple sources.
- Processes personal data without providing a privacy notice directly to the individual.
- Processes personal data in a way which involves tracking individuals' online or offline location or behaviour.
- Processes children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them.
- Processes personal data which could result in a risk of physical harm in the event of a security breach.

Data Protection Officers

The Company Directors take overall responsibility for data protection by HOLLYWOOD COMEDY CLUB for its clients, volunteers and employees.

Images

We may occasionally photograph or videotape events delivered by us. If you are present at the event your permission will be individually sought and your response respected.

Contact us

If you have any comments or queries about our Privacy Policy please contact HOLLYWOOD COMEDY CLUB.

| Appendix – The data we collect and the basis for collection |
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| Part 1 | Types of personal data |
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| Contact data | Email Address |
| Identity data | First Name Family Name |
| Marketing & Communication data | Preferences freely provided in receiving this type of communication from HOLLYWOOD COMEDY CLUB |
| Profile data | Preferences freely provided Access and use history |
| Technical data | IP Address Technical data collected when accessing the HOLLYWOOD COMEDY CLUB website |
| Transaction data | Details about payments made for member services |

| Part 2 | Lawful basis for processing activities |
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| Consent | You have given your express consent for us to process your personal data for a specific purpose. |
| Contract | The processing is necessary for us to perform our contractual obligations with you under our contract, or because you have asked us to take specific steps before entering into a contract with you |
| Legal obligation | The processing is necessary for us to comply with legal or regulatory obligations. |
| Legitimate interests | The processing is necessary for our or a third party's legitimate interest e.g. in order for us to provide the best service to you via our Site. Before we process your personal data on this basis we make sure we consider |

| and balance any potential impact on you, and we will not use your |
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| personal data on this basis where such impact outweighs our interest. |

| Purpose/Activity | Type of Data | Lawful basis for processing/Rationale |
|---|---|---|
| To register your account with us and provide our Services. | Identity & contact | To perform our contract with you. |
| To process your request for a service, and manage payments, fees and charges. | Identity, contact, financial, transaction, marketing & communications | To perform our contract with you; |
| To manage our relationship with you and notify you of changes to our Terms or Privacy Notice. | Identity, contact, profile, marketing & communications | (i) To perform our contract with you;(ii) As necessary to comply with a legal obligation; |
| | | (iii) As necessary for our legitimate interests in keeping our records updated and analysing how customers use our products/services. |
| To administer and protect our business and our Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). | Identity, contact & technical | (i) As necessary for our legitimate interests in running our business, provision of administration and IT services, and network security. (ii) As necessary to comply with any legal |
| | | obligations. |
| To deliver relevant website content/advertisements to you and measure or understand the effectiveness of our advertising. | Identity, contact, profile, usage, marketing, communications & technical | As necessary for our legitimate interests in studying 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 Site, Services, marketing, customer relationships and experiences. | Technical & usage | As necessary for our legitimate interests to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy. |

| Part 3 | Your legal rights - You have the following legal rights in relation to your personal data: |
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| Access your data | You can ask for access to and a copy of your personal data and can check we are lawfully processing it. |
| Correction | You can ask us to correct any incomplete or inaccurate personal data we hold about you |

| Erasure | You can ask us to delete or remove your personal data where: |
|-----------------------|---|
| | (a) there is no good reason for us continuing to process it; |
| | (b) you have successfully exercised your right to object (see below); |
| | (c) we may have processed your information unlawfully; or |
| | (d) we are required to erase your personal data to comply with local law. |
| | We may not always be able to comply with your request for specific legal reasons, which will be notified to you at the time of your request. |
| | You can object to the processing of your personal data where: |
| Object | (a) we are relying on our legitimate interest (or those of a third party) as the basis for processing your personal data, if you feel it impacts on your fundamental rights and freedoms; |
| | (b) 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 and in such circumstances, we can continue to process your persona data for such purposes. |
| | (c) you need us to hold your personal data (where we no longer require it) as you need it to establish, exercise or defend legal claims; or |
| Restrict processing | (d) you have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it. |
| Request a transfer | You can request a transfer of your personal data which is held in an automated manner and which you provided your consent for us to process such personal data or which we need to process to perform our contract with you, to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format. |
| Withdraw your consent | You can withdraw your consent at any time (where we are relying on consent to process your personal data). This does not affect the lawfulness of any processing carried out before you withdraw your consent. |

| Part 4 | Third Parties |
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| Service providers | Acting as processors who provide IT and system administration services. |
| Payment Gateway Providers | Acting as controller who require information to collect and process payments on our behalf for products you have ordered through our Site or to issue refunds. |

| Legal Advisors | Acting as processors or controllers, solicitors and law firms providing legal services. |
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| Professional advisors | Acting as processors or controllers including, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. |
| UK regulatory bodies including customs, regulators and other authorities | Acting as processors or controllers who require reporting of processing activities in certain circumstances. |
| Other third parties | Such third parties 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 Notice. |

| Part 5 | Glossary |
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| Aggregated data | Information such as statistical or demographic data which may be derived from personal data but which cannot by itself identify a data subject. |
| Controller | A body that determines the purposes and means of processing personal data. |
| Data subject | An individual living person identified by personal data (which will generally be you). |
| Personal data | Information identifying a data subject from that data alone or with other data we may hold but it does not include anonymised or aggregated data. |
| Processor | A body that is responsible for processing personal data on behalf of a controller. |
| Special categories of personal data | Information about race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, health, genetic, biometric data, sex life and sexual orientation. |
| ІСО | Information Commissioner's Office, the UK supervisory authority for data protection issues. |