

Data protection information notice for customers

1. Introduction

- 1.1 We are committed to safeguarding the privacy of all individuals whose personal data we store and process; in this notice we explain how we will handle your personal data.
- 1.2 This notice applies where we are acting as a data controller with respect to your personal data; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this notice, "we", "us" and "our" refer to *Ashman Media or Ashman Event Video*. For more information about Ashman Media or Ashman Event Video, see section 8.

2. How we use your personal data

- 2.1 In this section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 2.2 We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer or company name, your job title or role, email and website details, your contact details, and information contained in communications between us and you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers and keeping records of those communications. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships.
- 2.3 We may process information relating to competitors, athletes, marshals, volunteers or spectators. This data may include your name, job title, club or association, company name, email address and website address. Additional data may be captured and used at the consent phase of filming. We may process this information and include it in edited film material and social media clips for purpose of delivering a representation of a given event or race, sales & promotion of the event and future occurrences of the event. We are unable to remove these occurrences once editing has taken place. The legal basis for this processing is consent. Consent in the main will be captured as part of the filming and interview process.
- 2.4 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The source of the service data is you. The service data may be processed for the purposes of providing our services, ensuring the security of our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our business.
- 2.5 We may process any of your personal data identified in this notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the

protection and assertion of our legal rights, your legal rights and the legal rights of others.

- 2.6 We may process any of your personal data identified in this notice] where necessary for the purposes of managing risks or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.7 In addition to the specific purposes for which we may process your personal data set out in this section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.8 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this notice. Information about our group of companies can be found in Section 8.
- 3.2 We may disclose your personal data to our professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 In addition to the specific disclosures of personal data set out in this section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. Retaining and deleting personal data

- 4.1 This section 4 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 We will retain your personal data as follows:
- (a) *Company and personal data* will be retained for a minimum period of 5 years following the initial filming of the event, and for a maximum period of 10 years following.
- 4.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- (a) *Personal data and filmed consents of athletes, competitors, marshals, volunteers* will be stored as long as the social media and footage and completed film work is in circulation.

4.5 Notwithstanding the other provisions of this section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Security of personal data

5.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

5.2 We will store all your personal data on secure servers, personal computers and mobile devices.

5.3 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

6. Amendments

6.1 We publish changes to this notice on our websites at www.ashmanmedia.co.uk and www.ashmaneventvideo.co.uk

7. Your rights

7.1 In this section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access - you can ask for copies of your personal data;
- (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) the right to erasure - you can ask us to erase your personal data;
- (d) the right to restrict processing - you can ask us to restrict the processing of your personal data;
- (e) the right to object to processing - you can object to the processing of your personal data;
- (f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
- (g) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
- (h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

- 7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. Reference to names cannot be removed from edited and posted film work.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11 If you consider that our processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 To the extent that the legal basis for our processing of your personal data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by email steve@ashmanmedia.co.uk

8. Our details

8.1 Our full legal name is *Ashman Media, also trading as Ashman Event Video*.

8.2 Our registered office is at Middleton, Leicestershire LE16 8TQ

8.3 Our principal place of business is at Middleton, Leicestershire LE16 8TQ

8.4 You can contact us:

- (a) [by email, to steve@ashmanmedia.co.uk;
- (b) using our website contact form at www.ashmanmedia.co.uk or www.ashmeneventvideo.co.uk;

9. Data protection officer

9.1 Our data protection officer's contact details are: Steven Ashman.