

Billingsgate Management - Privacy Policy

Who we are

We are Billingsgate Management Limited, a company incorporated and registered in England and Wales with company number 04360232. Our registered office is 1 Old Billingsgate Walk, London EC3R 6DX. In this Privacy Policy it refers to "us", "we" and "our", and that is us – Billingsgate Management Limited.

We are usually a Controller of your personal data which means we are responsible for it. Sometimes we are a Processor of your personal data in relation to the services we provide to our clients.

What we do

We manage and hire out for events the space known as Old Billingsgate Market which you can find at 1 Old Billingsgate Walk, London, EC3R 6DX. We work with businesses and consumers to book this incredible space for events including gala dinners, parties, trade shows, conferences, fashion shows, exhibitions, film shoots weddings.

What this Privacy Policy is for

This document is our Privacy Policy. It explains why we process your personal data, what we do with your personal data, how we look after your personal data and what your rights are over your personal data. It applies to the processing of personal data in relation to the services we provide and the use of our website www.oldbillingsgate.co.uk.

What personal data we collect

When we refer to "personal data" we mean information about a living individual from which that individual can be identified. This means that information about organisations is not personal data.

I am a...	We process your...
<i>Potential Client (consumer)</i>	If you enquire about our services, we process your: • Full name • Email address • Contact telephone number(s) • Home Address • Date of birth • Data about the services you want to engage us, or our third-party suppliers, to provide, data about the contacts that have been made between us and any initial payments you have made • Marketing preferences • Identification documents, such as a copy of your passport or driving licence and utility bills
<i>Potential Client (commercial)</i>	If you work for or represent a commercial entity that makes an enquiry about our services, we process your: • Full name • Email address • Contact telephone number(s)

	• Job title
<i>Existing or Former Client (consumer)</i>	If you are an existing consumer client of ours, we process your: • Full name • Email address • Contact telephone number(s) • Home address • Date of birth • Data about the services we have provided to you, data about future services you want to engage us, or our third-party suppliers, to provide, data about the contacts that have been made between us • Debit and/or credit card details and details of the payments you have made • Marketing preferences • Identification documents, such as a copy of your passport or driving licence and utility bills •
<i>Existing or Former Client (commercial)</i>	If you work for or represent a commercial client of ours, we process your: • Full name • Email address • Contact telephone number(s) • Job title
<i>A Subscriber to our Mailing List</i>	If you subscribe to our mailing list, we process your: • Full name • Email address • Marketing preferences
<i>A Visitor to our Website</i>	When you visit our website, we process information about how you use it. For example, we process personal data about your internet browser, operating device and application identifiers, IP address and geo-location information, access times and dates, referring and exit pages, URLs, clickstream data, search items, pages viewed and time spent on pages.
<i>A Guest at an Event Hosted at Old Billingsgate</i>	If you are a guest at an event hosted at Old Billingsgate, we might process your full name.
<i>A Friend on Social Media</i>	If you follow us on social media, we process your username and the personal data that you make publicly available on your social media account.
<i>A Third-Party Supplier</i>	If you work for one of our third-party suppliers, or if you work with us to provide our services to clients, we may process personal data about you and your colleagues that we work with in order to help us facilitate our services. This includes your full name, email address, contact telephone number and job title.

Special categories of personal data

As well as "personal data" you may have heard about "special categories of personal data". This is information about an individual's race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We do not collect any special categories of personal data.

Our services and our website are not intended for use by children, and we do not knowingly process personal data relating to children.

Where we get your personal data from

We collect personal data from a number of different sources, including:

- (a) From you directly:
 - when you correspond with us by email, phone, through social media, post or otherwise;
 - when you use our website, for example when you navigate through our website, from contact forms you submit and when you subscribe to our mailing list.
- (b) From someone on your behalf: if you are a guest or a performer at an event hosted at Old Billingsgate we may get personal data about you from our client contact. These third-parties may be based inside or outside of the EEA.
- (c) From third-parties: such as the suppliers we work with, or that provide services to you, in relation to events hosted at Old Billingsgate.
- (d) From publicly available sources.

We try to be sure that the personal data we hold about you is accurate and so please get in touch with us if your personal data changes so we can update our records. You can contact us using the details provided in this Privacy Policy.

Why does Old Billingsgate need to process personal data?

Purpose of Processing	Types of Data Processed	Lawful Basis for Processing
To communicate with you, and for you to communicate with us	Full name, email address, contact telephone number(s), home address, date of birth and job title Data about the services we have been asked to provide or have provided to you Marketing preferences Social media details	Performance of a contract, or the potential performance of a contract, with you Necessary for our legitimate interests (for running our business, to respond to any questions or complaints, to keep our records updated and to provide you with the services you have requested)
To set you up as a client on our system	Full name, email address, contact telephone number(s), home	Performance of a contract, or the potential performance of a contract, with you

	address, date of birth and job title	Necessary for our legitimate interests (for running our business, to respond to any questions or complaints, to keep our records updated and to provide you with the services you have requested)
For us to provide you with, and to administer, our services	Full name, email address, contact telephone number(s), home address, date of birth and job title Data about the services we have been asked to provide or have provided to you Debit and/or credit card details and details of the payments you have made Marketing preferences Identification documents, such as a copy of your passport or driving licence and utility bills	Performance of a contract, or the potential performance of a contract, with you Necessary for our legitimate interests (to facilitate the provision of services to you, for running our business and for administrative purposes)
To introduce you to third party suppliers that can assist you with the services you require	Full name, email address, contact telephone number(s), home address, date of birth and job title Data about the services we have been asked to provide or have provided to you	Performance of a contract, or the potential performance of a contract, with you Necessary for our legitimate interests (to facilitate the provision of services to you, for running our business and for administrative purposes)
Where you work for or represent a third party supplier, for you to provide us or our clients with your services	Full name, email address, contact telephone number and job title	Performance of a contract, or the potential performance of a contract, with you Necessary for our legitimate interests (to facilitate the provision of services to us and our clients, for running our business and for administrative purposes)
To provide information to you about services that might interest you	Full name and email address Marketing preferences Social media information	Necessary for our legitimate interests (to develop and grow our business)

		Consent (for email direct marketing)
To administer and protect our business and website (e.g., troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Full name, email address, contact telephone number(s), home address, date of birth and job title Data about the services we have been asked to provide or have provided to you Debit and/or credit card details and details of the payments you have made Identification documents, such as a copy of your passport or driving licence and utility bills Internet browser, operating device and application identifiers, IP address and geo-location information, access times and dates, referring and exit pages, URLs, clickstream data, search items, pages viewed and time spent on pages	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring). Necessary to comply with our legal obligations
To comply with requirements imposed by law or any court order (for example to verify your identity and to prevent or detect fraud)	Full name, email address, contact telephone number(s), home address, date of birth and job title Data about the services we have been asked to provide or have provided to you Debit and/or credit card details and details of the payments you have made Marketing preferences Identification documents, such as a copy of your passport or driving licence and utility bills	Necessary to comply with our legal obligations

Where we need to process your personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we

have or are trying to enter into with you. This means that we may not be able to provide you with the information or services you require. We will let you know if this is the case at the time.

We may process your personal data for a different purpose than that listed above, and without your consent, where it is necessary for us to comply with our legal obligations.

If you would like further information about the specific lawful basis for our processing of your personal data, please get in touch with us.

Marketing

We may process your personal data for marketing purposes if you have signed up to our mailing list and you have not opted-out of receiving the communication. We send these marketing communications by email.

If you no longer want to receive marketing communications from us you can change your mind at any time by:

- (a) clicking the unsubscribe link on the email you receive; or
- (b) contacting us using the details in this Privacy Policy.

If you opt-out of receiving marketing communications we may still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations.

Our website and cookies

Our website may automatically collect data about how you use our services in order to help us improve future functionality. This may include personal data.

Our website may include links to third-party websites, content, plug-ins or applications that allow third parties to collect or share your personal data. We have no control over the processing activities of these third-party websites. When you leave our website, please read the privacy policy of each website you visit.

What does Old Billingsgate do with my personal data?

We use your personal data for the purposes set out above. This might mean that we have to share your personal data with third parties, including:

- (a) Service providers who act as processors on our behalf or controllers in their own right, in order to provide services to you. This includes, in particular:
 - *Event Operations Ltd* – an onsite independent production company that manages our in-house technical equipment. If you have any technical requirements, we introduce to you each other so you can liaise directly.
 - *Concerto Events Ltd* – an event management company that helps us to manage events as block bookings in the Summer and Christmas periods. If you want to make a booking during this period, we introduce you to each other so Concerto can help manage your event.
 - *Zeloof LLP trading as The Truman Brewery* – a company that manages event spaces in the Truman Brewery on Brick Lane. If we cannot accommodate your event, we can introduce you to the Truman Brewery who may be able to assist.

- *Old Billingsgate Management Ltd* – a booking agent that books clients in relation to the hiring of space at Old Billingsgate.
- *Mailchimp* – an online data marketing tool that we use to create and send our online newsletters.

(b) Our professional advisers, such as our auditors and solicitors.

(c) If we choose to restructure our business we may share your personal data with third parties who we choose to sell, transfer or merge parts of our business and assets with, or who we seek to acquire or merge with. New owners of our business, unless they tell you otherwise, may use your personal data in the same way as set out in this Privacy Policy.

(d) Other legal, regulatory, judicial and law-enforcement agencies who we may need to share personal data with to comply with our legal obligations.

These third parties are required to respect the security of your personal data and treat it in accordance with the law.

Some of the third parties may be based outside of the EEA.

Additional information about your personal data

Transfers outside of the EEA

We may share your personal data with third parties that are based outside of the European Economic Area (EEA). Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- (b) We may use specific contracts approved by the European Commission which give personal data the same protection it has in EEA.
- (c) Where we use providers based in the USA we may transfer your data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data as is provided in the EEA.

How we keep your data safe

Once we have received your personal data we will use reasonable and necessary procedures and security features to try and prevent unauthorised access. For example:

- (a) We limit those who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality.
- (b) We require users to have complex passwords.
- (c) We store data on servers protected by a firewall, and our server software is regularly updated with the software updates.
- (d) We regularly back-up our data.

If we become aware of a data breach that affects the personal data we hold, we will notify the Information Commissioner's Office. If we believe the data breach is serious, we may notify you in accordance with our legal requirements.

How long we keep your data for

Under data protection laws, we cannot retain your personal data in a form that identifies you for longer than is necessary to fulfil the purposes for which we collected it. This may include for the purposes of satisfying any legal, accounting or reporting requirements.

We usually store personal data for 7 years from the last communication from you that we receive, but there may be occasions where we need to store it for longer or shorter periods. In order to determine how long we store your personal data for, we take into consideration why we need to continue to store your personal data, whether we can achieve the same result without having access to your data, and what the potential risk is if there is a data breach that affects your data.

Your rights over your personal data

Your personal data belongs to you, and you have a number of rights over it. You can:

- (a) Ask us for details of the personal data we hold and process about you (this is usually called a subject access request).
- (b) Ask that any inaccurate information we hold about you is corrected.
- (c) Ask that we delete personal data that we hold about you.
- (d) Ask that we stop using your personal data for certain purposes.
- (e) Ask that we do not make decisions about you using completely automated means.
- (f) Withdraw your consent.
- (g) Ask that we give you a copy of the data we hold about you, or (where it's technically feasible for us to do so) that we give this personal data to a third-party chosen by you, in a commonly-used, machine-readable, format.

These rights are not available to everyone all of the time. Some are subject to exemptions, and so we may not always be able, or required, to comply with your request to exercise these rights. For more information about your rights, please read: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

To exercise your rights, please contact us using the details below. We would be grateful if you could provide us with as much information as you can so we can respond as soon as we can. Sometimes we might need proof of your identity (for example, your passport or driving licence) before we can fully respond so we can be sure we are giving the correct personal data to the correct individual.

We usually respond to data subject requests within one month, but it can take longer if your request is particularly complex or if you have a number of requests. You will not usually have to pay a fee, but we reserve the right to charge a fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request.

Who you can contact about our processing of your personal data

If you have questions about our processing of your personal data please email:
info@oldbillingsgate.co.uk

If, after speaking with us, you are not happy with how we are processing your personal data, you have the right to complain to the Information Commissioner's Office. Further details can be found at:
www.ico.org.uk