

BAR21 Data Privacy Notice (updated 18/05/2018)

Scope

This document provides you with information about how we are handling, or are intending to handle, your personal information:

If you are aged 16 or under, please get your parent/guardian's permission before you provide any personal information to us.

About us

BAR21 is committed to protecting and respecting your privacy and complying with the principles of applicable data protection laws. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The data controller of the personal data referred to in this policy is BAR21 of 10 Thomas Street, Manchester M4 1DH.

Collection of personal data

BAR21 may collect and/or create or otherwise obtain and process the following data about you:

- Information about you that you provide by filling in forms while registering for activities and making purchases on our websites

BAR21 websites

- bar21.uk
- 4thwall.club
- This includes information provided at the time of registering to use our websites, becoming a member of BAR21, subscribing to our communications, posting material, bookings, entering and attending events or requesting further services.
- Information from your social media accounts but only where you have given us permission to use it. For example, posts, pictures and video footage you share on sites such as Facebook and Twitter.
- We may also ask you for information when you report a problem or make a complaint and, if you contact us, we may keep a record of that correspondence.
- Details of when you digitally interact with BAR21 via our websites and other digital channels and the resources that you access which may include the use of cookies (subject to our Cookie policy).
- Information about emails and other communications we have sent to you and your interaction with them.
- Information from third parties where you consent to those other organisations sharing information they hold on you with us, and where those other organisations lawfully share your information with us.

Uses made of your information and the basis of processing

BAR21 will use your personal information to:

- Ensure that content from our websites is presented in the most effective manner;
- Authenticate you when you register;
- Carry out our obligations arising from any contracts entered into between you and BAR21;
- Provide you with information, products or services that you request from BAR21 or which we feel may interest you, where we are legally entitled to do so;
- Allow you to participate in interactive features of BAR21's service, when you choose to do so;
- Notify you about changes to our service;
- To gather statistics about memberships and people interested in BAR21; or

BAR21 will not use any of the personal information we collect from you to make automated business decisions.

The legal basis on which we collect and process the personal data described above depends on the personal information concerned and the specific context in which we collect it. However, we will only use your personal information where we:

- Have your consent to do so;
- Need the personal data to perform a contract with you;
- Need to process your personal information for our legitimate interests and only where our legitimate interests are not overridden by your data protection interests or fundamental rights and freedoms;
- Have a legal obligation to collect personal information from you; or
- Need the personal information protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time, and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your personal information).

Information security

BAR21 will take all steps reasonably necessary including policies, procedures and security features to ensure that your data is treated securely and protected from unauthorised and unlawful access and/or use, and in accordance with this notice. Unfortunately, the transmission of information via the internet is not completely secure and, although we will do our best to protect your personal data transmitted to us via the internet, we cannot guarantee the security of your data transmitted to our website from your device. Any transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share such a password with anyone.

Where any payments are being collected on our behalf, we require our payment providers to be compliant with the Payment Card Industry's Data Security standards (PCI-DSS).

Recipients of personal data

We will not share information about you with our suppliers.

Categories of organisation and purpose

- **Marketing agencies** - to provide relevant digital content to our customers
- **Database hosting companies** - to host BAR21 digital platforms and associated customer databases to enable customers to log in and interact with the website
- **Email broadcasting companies** - to send emails to our customers
- **SMS broadcasting companies** - to send SMS and text messages to our customers
- **Social media companies (e.g. Facebook/Twitter)** - to verify your identify when you register on our web site using 'register with' functions and to provide you with relevant social media posts

International transfer of personal data

We do not envisage transferring any information about or relating to individuals to anyone who is located outside of the European Economic Area.

If you choose to sign-up with Facebook/Twitter when you register on our website, BAR21 may access your personal data in your Facebook/Twitter account, depending on your settings, and we may post information submitted on our websites to Facebook/Twitter who will store such information in both the UK and the United States. The EU has not endorsed the privacy laws of the United States but has approved a framework for the transfer of personal data called the EU:US Privacy Shield under which Facebook/Twitter has a valid certificate enabling us to lawfully transfer your personal data to Facebook. You may review Facebook/Twitter's Privacy Shield certificate [here](#).

Data retention period

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- As long as you continue to log into our website or use our services (including engaging with emails, booking events, making purchases, entering prize draws or downloading content) we will retain and process information about you. In such cases, you will be considered to be an 'active' customer. If you have not been 'active' as a customer for a period of three years, BAR21 will deactivate your customer account and anonymise any personal data relating to you.

- Personal data linked to the processing of insurance claims, subject access requests, disputes, safeguarding investigations, disciplinary or police matters will only be kept for as long as it necessary for those purposes, as each is applicable.

IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

In addition to the above we use third party cookies and pixels to advertise BAR21 and our products across the internet (for example via Google AdWords Remarketing and other services).

Remarketing will display relevant adverts tailored to you based on what parts of the BAR21 website you have viewed by placing a cookie on your machine. This does not in any way identify you or give access to your computer. Remarketing allows us to tailor our marketing to better suit your needs and only display adverts that are relevant to you.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Site.

Please note that our advertisers may also use cookies, over which we have no control.

In addition to cookies, BAR21 records the activity of users signed in to our websites in order to help us improve your customer experience and provide you with support.

The data subject's rights

Data protection laws grant you, as a Data Subject, certain 'information rights', which are summarised below:

- **Right of access** - You have the right to obtain a copy of information we hold about you
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Please note that we may be entitled to retain your personal data despite your request, for example if we are under a separate legal obligation to retain it. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared their data about your request for erasure.
- **Right to restriction of processing** - You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.
- **Right to Portability** - You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.
- **Right to Object** - You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.
- **Right to Withdraw Consent** - You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent.
- **Right of Complaint** - You also have the right to lodge a complaint about any aspect of how we are handling your data with the *UK Information Commissioner's Office*, which can be contacted at www.ico.org.uk.
- **Right to Opt-out of Marketing Communications** - You have the right to opt-out of marketing communications we send to you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you.

Changes to our privacy policy

Any changes we may make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by date-stamped communication.

How to contact us

If you wish to contact us about your personal data or exercise any of the rights described above please contact: admin@bar21.uk