

Smyle Privacy Policy

Smyle delivers professional services and associated activities of conference organisers.

Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Smyle collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy statements we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other privacy statements and is not intended to override them.

Data Controller

Smyle Creative Limited of The Lockhouse, Mead Lane, Hertford, England, SG13 7AX is the data controller and responsible for your personal data (collectively referred to as “Smyle” “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

Legal Entity	Smyle Creative Limited
Data Privacy Manager	Steve Arnott, Head of Technology
Email Address	dataprotection@smyle.co.uk
Postal Address	The Lockhouse, Mead Lane, Hertford, England, SG13 7AX

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last reviewed on 31st October 2023 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you provide to us should change, during the course of your relationship with us.

The Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

(A) Identity Data

This includes data relating specifically to your identity, such as your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

(B) Contact Data

This includes data relating to how you may be contacted, such as your billing address, delivery address, email address and telephone numbers.

(C) Technical Data

This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated

Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories of Personal Data

You may provide us with the following special categories of personal data about you.

Details about your:

- dietary requirements which may disclose your religious or philosophical beliefs;
- health;
- race or ethnicity;
- genetic and biometric data.

We collect and process the above data only where it is strictly necessary to do so in order to fulfil the terms of a contract we have with you. Furthermore, we will only collect and process the above special categories of sensitive personal data where you have provided us with your explicit consent to do so.

You are not under any obligation to consent to us processing your sensitive personal data. However, without your consent, we may not be able to fulfil the terms of a contract we have with you.

If you are happy to consent to our use of your sensitive personal data, you will also be able to withdraw your consent at any time.

Where we need to collect 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.

How your personal data is collected

We use different methods to collect data from and about you including through:

(A) Direct interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, by completing online registration forms or otherwise. This includes personal data you provide when you:

- request that we provide services or information to you;
- register on our website;
- complete online job applications, including registering as a freelancer;
- provide us with feedback.

(B) Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

- We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

(A) Third-party marketing

We do not share personal data with any company outside the Smyle Group for marketing purposes.

(B) Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time either through the unsubscribe button on our email or via email to: dataprotection@smyle.co.uk.

Where you opt out of receiving these marketing messages, this will not apply to personal data that you have provided to us as a result of provision of services to you or other such transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us by email: dataprotection@smyle.co.uk If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

(A) Internal Third Parties as set out in the *Glossary*.

(B) External Third Parties as set out in the *Glossary*.

(C) Third parties to 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Many of our external third parties are based within the EEA however occasionally we may have to transfer your data outside the EEA.

Where you requested services which are being provided or otherwise due to be fulfilled outside the EEA, we will have to transfer your personal data to the suppliers who are assisting us in providing those services outside the EEA in order to provide the services and fulfil our contractual obligations. Where we are unable to rely on one of the safeguards outlined below when transferring data to those suppliers outside the EEA, we will rely on the derogation under Article 49 of the GDPR in order to transfer your personal data to countries outside the EEA (as the transfer relates to the performance of a contract for your benefit), and you hereby permit us to do so. You also acknowledge that where your personal data is transferred outside the EEA, controls on data protection may not be as wide as the legal requirements within the EEA.

For all other transfers of data, whenever your personal data is transferred outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European

Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

Please contact us by email at: dataprotection@smyle.co.uk if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

Your personal data will be retained 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.

In addition to the above, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for legal and tax purposes.

In some circumstances you can ask us to delete your data: see *Request Erasure* below for further information.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see YOUR LEGAL RIGHTS which follows below to find out more about these rights:

- (A) Request access to your personal data.
- (B) Request correction of your personal data.
- (C) Request erasure of your personal data.
- (D) Request restriction of processing your personal data.
- (E) Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us by email to: dataprotection@smyle.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

(A) Lawful Basis

- Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best

and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us by email to: dataprotection@smyle.co.uk .

- Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

(B) Third Parties

- Internal Third Parties

Other companies in the Smyle Group acting as joint controllers or processors and who are based in the United Kingdom. External Third Parties

Service providers acting as processors based in the United Kingdom who provide an event registration service, assist with group travel bookings and recruitment services.

1. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
2. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

(C) Your Legal Rights

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to

process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful but you do not want us to erase it;
 - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.