

## **EVITO LTD - Privacy Policy**

### **What is the purpose of this Privacy Policy?**

EVITO LTD (“EVITO”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation (the Data Protection Act 1998 until 24 May 2018 and the General Data Protection Regulations (the “GDPR”) from 25 May 2018.

The EVITO is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to organisations and members their staff who engage EVITO to deliver event management services or have enquired about doing so. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### **Data protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### **The kind of information we hold 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, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Location of employment or workplace
- Your communication preferences
- Details of your event requirements
- Records of communications and interactions we have had with you
- Records of payments made to us in relation to your event booking

## **How is your personal information collected?**

We collect personal information about you by you completing and submitting a form on our website or by corresponding with us by phone, email or otherwise. Alternatively you may be registered for an event that we are managing on behalf of a client via a registration website or emailed information to us by a client.

## **How we will use information about you and the legal basis for processing your data under the GDPR**

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

1. Where we need to perform the contract we have entered into with you or in order to take steps at your request prior to the entry into a contract.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information where we need to protect your interests (or someone else's interests).

## **Situations in which we will use your personal information**

We need all the categories of information in the list above (see The kind of information we hold about you) primarily to allow us to perform our contract with you[\*] and to enable us to comply with legal obligations[\*\*]. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties[\*\*\*], provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. [We have indicated by [asterisks] the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.]

- To provide you with the information and services that you request from us.
- To contact you in relation to your enquiry and/or event booking, including for the purposes of feedback
- To ensure we meet any and all legal obligations with regards to the service we provide to you for the duration of your contract
- To administer and fulfil requirements as agreed in the contract and any related terms and conditions
- To notify you about changes to our service.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- To prevent fraud.
- To ensure the information we hold about you is up to date and accurate.
- To inform you of any changes to our website, services or goods and products.
- To provide you with relevant news and special offers by email, text message, phone or post (except where you have opted out)

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as your event booking contract) or respond to your enquiry).

## **Change of purpose**

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Data sharing**

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU (for example when working with EVITO clients based in the USA).

If we do, you can expect a similar degree of protection in respect of your personal information.

## **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer the [working] relationship with you or where we have another legitimate interest in doing so.

## **Which third-party service providers process my personal information?**

“Third parties” includes third-party service providers (including contractors, event sponsors and designated agents) and other entities within our group. The following third-party service providers process personal information about you for the following purposes:

- External event suppliers where you have specifically requested we do so
- Hotels where we are making bookings for you and your delegates
- Travel agencies if we are required to make travel arrangements

## **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business and operations of EVITO. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **Transferring information outside the EU**

We may transfer the personal information we collect about you to the following country outside the EU:

USA - in order to perform our contract with you. There is not an adequacy decision by the European Commission in respect of that country. This means that the country to which we transfer your data is not deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure[s] to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- Contractual provisions with EVITO clients based on the USA

## **Data security**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

## **Data retention**

### **How long will you use my information for?**

We will only retain your personal information 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 some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your [working] relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact EVITO’s Data Protection Officer in writing.

### **No fee usually required**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the EVITO's Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Data Protection Officer**

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at:

EVITO Ltd  
7 Fircroft  
Branksomewood Road  
Fleet  
GU51 4 JF

e-mail: [paul.trowbridge@evito.net](mailto:paul.trowbridge@evito.net)

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.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.