**Curve Media Limited**

**Website Privacy Policy**

This privacy policy sets out how we collect information via our company website including any features, applications, widgets or online services that post this privacy policy e.g. the Curve Media Facebook account or Twitter page (**“Accounts”**).

We use your personal data as is further described in this privacy policy. Any information that we collect about you that is personal to you, and from which it is possible to identify you, is known as personal data for the purposes of data protection law. We respect the privacy of every person who visits the Curve Media website and/or the Accounts (together defined as the **“Site”**) and we are committed to ensuring a safe online experience.

The Site is operated by Curve Media Limited, (**“we”, “us” or “our”**) and we are an English company with registered company number: 08780200 and whose registered office is at 19-21 Nile Street, London N1 7LL.

**“You”, “your” & “yourself”** refers to visitors to and users of the Site and its content and, where appropriate, persons submitting personal information, photographs and/or other materials.

**Purpose of this Policy**

This privacy policy (**“Privacy Policy”**) explains how we deal with personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information and will also inform your rights with regard to your personal data. We are the data controller in relation to all such personal information.

This Privacy Policy is intended to assist you in making informed decisions when using the Site. Please take a moment to read and understand it. Please note that it should be read in conjunction with our Website Terms and Conditions and Cookie Policy [INCLUDE LINKS TO THESE HERE].

Please also note that this Privacy Policy only applies to the use of your personal information obtained by us, it does not apply to your personal information collected during your communications with third parties.

The collection and use of your data is governed by the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679. We are committed to safeguarding your personal information in a confidential and secure environment. We are registered with the Information Commissioner’s Office (“ICO”) as a data controller, with registration number ZA283416. We reserve the right to change this Privacy Policy (or any part of it) at any time without prior notice. If we make any changes, we will publish the updated Privacy Notice on the main company Website.

**Information collected**

We collect personal information and **“Personal Information”** which is information relating to you, which can be used to personally identify you (either directly or indirectly). The types of Personal Information we may collect about you include any Personal Information you submit via the Site or which you otherwise send to us and/or any information you are asked by us to provide including but not limited to your name, your user name (whether or not you have identified yourself by your real name or otherwise), place of origin, email address, other contact information, and/or any other information or material (including tweets or posts) you choose to submit to the Site.

We may also collect information about your use of the Site, such as browsing patterns, but information collected in this way will not identify you personally. Our servers also automatically record certain information that your web browser sends whenever you visit any website. This may include your web request, internet protocol address, browser type, browser language, URLs, URLs domain names, pages viewed and other matters together with cookies which may identify your browser. We may use this information to find out about how visitors use the Site. Website usage information is collected automatically through the use of cookies. For more information about cookies, please see our cookies policy [INCLUDE LINK HERE]

**What is our legal basis for collecting and using your personal information?**

We will only use your Personal Information where we have a lawful basis to do so. In most cases we will use your Personal Information:

- because it is necessary to pursue our legitimate interests and where there is no undue adverse impact on you;

-to comply with a legal obligation to which we are subject;

-where you have given your consent to us to use your Personal Information.

Where we are processing Personal Information for the purposes of pursuing our legitimate interests, such interests may include:

i) responding to any complaints or queries you may have, providing you with information you request and/or to help us operate and improve the Site;

ii) for research, marketing, promotion and publicity and other purposes connected with our business and for the development, production, exploitation, distribution, advertising, publicity and promotion of our programmes;

iii) identifying you when you contact us or use Site;

iv) establishing, exercising or defending legal claims;

v) protecting your personal data, protecting our rights and others;

vi) Comply with applicable laws or legal process and/or respond to requests from public and government authorities

We may send you, with your prior consent, via email, SMS, telephone, chat and social media offers, promotions and other marketing communications regarding the our services, other programmes/services/products of Curve Media. You can revoke your consent to the processing of your personal data at any time by sending a communication to the email address described in the How to contact us? paragraph below.

**How do we process your personal data?**

We process your personal data through both electronic and manual means. It is protected by adequate security measures, we use appropriate administrative, technical, personnel and physical measures to safeguard Personal Information of yours in our possession against loss, theft and unauthorised use, disclosure or modification. However, the internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your Personal Information for improper purposes. All of our employees and data processors (i.e. those who process your Personal Information on our behalf), who have access to, and are associated with the processing of Personal Information, are obliged to respect the confidentiality of the Personal Information of all users

**Sharing your personal information**

We may share your Personal Information with professional advisers such as lawyers and accountants and/or governmental, law enforcement agencies or regulatory authorities to comply with applicable laws and regulations.

We may share your Personal Information with third party companies, agents, contractors, but only insofar as is necessary for the purposes described in this Privacy Policy. We may also share your Personal Information with service providers entrusted with processing activities and duly appointed as processors when required by applicable laws e.g. cloud service providers, companies that provide IT services, experts, consultants.

**Is your personal information transferred abroad?**

Your personal data may be transferred to other countries (including countries other than where you are based that have a different data protection regime than the one existing in the country where you are based). Where we transfer your personal data outside the EEA we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the personal information concerned e.g. if the recipient is located in the USA, we will check whether it is a certified member of the EU-US Privacy Shield scheme. In other circumstances, the law may permit us to otherwise transfer your personal information outside the EEA. In all cases, however, any transfer of your Personal Information will be compliant with applicable data protection law.

**What are your rights with regard to your personal information?**

You have the right to:

i) Obtain confirmation as to whether or not your personal data exists and to be informed of its content and source, verify its accuracy and request its rectification, update or amendment;

ii) Request the deletion, anonymisation or restriction of the processing of your personal data processed in breach of applicable law;

iii) Object to or request the limiting of the processing, in all cases, of your Personal Information for legitimate reasons;

iv) Receive an electronic copy of your personal data, if you would like to port the personal data, which you have provided to us, to yourself or to a different provider (data portability), when the Personal Information is processed by automatic means and the processing is either (i) based upon your consent or (ii) necessary for the provision of our service; and

v) Lodge a complaint with the relevant data protection regulatory authority.

You may send your request to the email address indicated under How to contact us? Paragraph. In your request, please include your email address, name, address, and telephone number and specify clearly which information you would like to access, change, update, suppress, or delete.

Remember that even after you cancel your registration (if applicable) or if you ask us to delete your personal data, copies of that information from your registration may remain viewable in some circumstances where, for example, you have shared information with social media or other services or, for example, when retention of copies is necessary to comply with legal obligation or legal defence. Because of the nature of caching technology, your registration may not be instantly inaccessible to others. We may also retain backups of your Personal Information on our servers for some time after cancellation or your request for deletion, to comply with applicable law.

Where your Personal Information is used for marketing purposes you may revoke your consent for:

-Receiving electronic communications from us. If you no longer want to receive future marketing-related emails from us you may opt-out of receiving them by following the unsubscribe instructions in our communications. You may also send a request to the email address at the How to contact us? paragraph of this Privacy Policy.

**Retention Rights**

We will retain your Personal Information only for the period necessary to fulfil the purposes for which the data was collected

**How to contact us?**

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by sending an email to XXXXXX@curvemedia.com. We will use reasonable efforts to answer promptly your question or resolve your problem. You also have the right to lodge a complaint with the ICO if you feel any concern of yours relating to this Privacy Policy has not been dealt with properly. The ICO may be contacted at [https://ico.org.uk/concerns/](about:blank).

We are reliant on you to ensure that the Personal Information you provide to us is up to date and accurate, and you agree to provide true and accurate information about yourself as requested by us. Where you have submitted any personal data to Site, in order to assist us in ensuring your Personal Information is up to date, please let us know if any of your personal details change by emailing us at XXXXXX@curvemedia.com

**Changes to this Privacy Policy**

To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information and as required to comply with changes in applicable law or regulatory requirements. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.