

# WEBSITE PRIVACY NOTICE

## Introduction

Welcome to Byrom plc and its subsidiaries' (including MATCH Accommodation AG and GTS Events Limited) privacy notice.

Byrom plc and its subsidiaries respect your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data (including when you simply visit any of our websites, regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how Byrom plc and its subsidiaries collect and process your personal data through your use of this website, including any data you may provide to us (through this website or otherwise) when you sign up to our newsletter, register an account, request a call back, register your interest in one of our products or services, purchase anything or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children (being a person under the age of 16 for the purpose of this privacy notice).

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notices and is not intended to override them.

### Controller

Byrom plc is the data controller and responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights please contact us using the details set out below.

### Contact details

Full name of legal entity: Byrom plc and its subsidiaries' (including MATCH Accommodation AG and GTS Events Limited)

Name: Head of Legal

Email address: [enquiries@byrom.plc.uk](mailto:enquiries@byrom.plc.uk)

Postal address: SEAMOS House, Brooks Dr, Cheadle SK8 3SA

Telephone Number: +44 (0) 161 492 1800

You have the right to make a complaint at any time to the supervisory authority for data protection issues in your country of residence. We would, however, appreciate the chance to deal with your concerns before you approach your supervisory authority, 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 updated on 8<sup>th</sup> September 2020.

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

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. 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 as follows (please note that depending on your arrangement with us, we may collect some or all of these different kinds of personal data about you):

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, e-mail address and telephone numbers.
- **Financial Data** includes bank account and payment card details. Please note that whilst we may in limited circumstances receive payment card details from you, we do not store payment card details after payment has been made by you and received by us.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share **Aggregated Data or Pseudonymised Data** such as statistical or demographic data for any purpose. Aggregated Data or Pseudonymised 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 or Pseudonymised 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 only be used in accordance with this privacy notice.

If you require disabled or assisted access to any stadium, hotel and/or accommodation or have special dietary requirements, you may provide, and we may collect and store **Special Categories of Personal Data** in the form of any disabilities or health conditions you may have. Apart from this we do not collect any other **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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

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 (for example, to provide you with goods or services). In this case, we may have to terminate our contract with you, but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:

- apply for or purchase our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing information to be sent to you;
- enter a competition or survey; or
- give us some feedback.

- **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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at the end of this privacy notice for further details.

- Technical Data from the following parties:

- (a) analytics and search information providers such as Google; and
- (b) advertising networks such as Microsoft.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

#### 4. 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. 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.
- 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. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product 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 at enquiries@byrom.plc.uk.
- Where we need to comply with a legal or regulatory obligation. 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.

Generally, we do not rely on consent as a legal basis for processing your personal data; other than we may in certain circumstances rely on consent as a legal basis for processing your personal data in relation to sending direct marketing communications to you via e-mail (if you consent to them doing so). You have the right to withdraw consent to marketing at any time by contacting us at enquiries@byrom.plc.uk.

#### Purposes for which we will use your personal data

We have set out below, in a table format, 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.

Please 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. Please contact us at enquiries@byrom.plc.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Sending our invoice and managing payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collecting and recovering money owed to us	(e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about (i) changes to our terms or privacy policy, and (ii) your account and purchase (b) Asking you to provide feedback or take a survey (c) Providing you with our <b>general customer service communications</b> d) Providing you with important last minute or emergency event communications	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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 exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our

products/services, marketing, customer relationships and experiences		products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have consented to it or requested information from us or entered into a contract with us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have expressly opted in to receive that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Byrom plc group of companies for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at [enquiries@byrom.plc.uk](mailto:enquiries@byrom.plc.uk) at any time or by logging into your account and checking or unchecking relevant boxes to adjust your marketing preferences.

Where you opt out of receiving these marketing messages, we may still retain some of your personal data and contact you in relation to your contract, purchase or other transactions with us.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy at the end of this privacy notice for further details.

## 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 at [enquiries@byrom.plc.uk](mailto:enquiries@byrom.plc.uk).

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.

## 5. 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.

- Internal Third Parties. Other companies in the Byrom plc group of companies and who provide IT and system administration services and undertake leadership reporting.
- External Third Parties. Including the following:
  - Service providers acting as processors who provide payment, IT and system administration services, with whom we need to share your information in order to obtain payment from you or to provide the product or service you have requested.
  - Professional advisers or investigators acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
  - Law enforcement agencies or local authorities, or security services for the purposes of event security and safety.
  - Relevant tax authority, regulators and other authorities acting as processors or joint controllers based who require reporting of processing activities in certain circumstances.
  - Event or tournament organisers (including but not limited to FIFA, the LOC, ATP, The R&A or F1).
  - Media buying and web agencies including organisations managing or purchasing paid search keywords or display advertising.
- 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.

## 6. International transfers

We share your personal data within the Byrom plc group of companies. This will involve transferring your data outside the European Economic Area (EEA).

Your personal data information may be processed in Switzerland and may be stored and used elsewhere depending on the location of the Byrom plc group of companies or service provider who are permitted to

access such information under these rules (and such locations may include countries which may not afford the same level of protection of such data as the country from which you provided the information).

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by seeking to implement at least one of the following safeguards:

- 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](#).

## **7. 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. 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.

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.

If you communicate with us by e-mail, you should note that the secrecy of Internet e-mail is uncertain. By sending sensitive or confidential e-mail messages or information which are not encrypted you accept the risk of such uncertainty and possible lack of confidentiality over the Internet.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data 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 and/or, where you have provided your consent, future marketing, and other related communications with you.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up to six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data (please see Request erasure below for further information).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with

you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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). If we provide you with an account, you may review, correct, update or change your personal information at any time by accessing your account.
- **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.
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **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.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **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 or fulfil our contractual obligations. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at [enquiries@byrom.plc.uk](mailto:enquiries@byrom.plc.uk).

### No fee usually required

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.

### **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 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.

### **Time limit to respond**

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.

### **QUESTIONS OR SUGGESTIONS**

If you have questions or suggestions about this Privacy Policy or your personal information, please contact us at [enquiries@byrom.plc.uk](mailto:enquiries@byrom.plc.uk).

## Cookie Policy

Byrom plc may set and access Byrom plc cookies on your computer. A cookie is a text-only string of information that a website transfers to the cookie file of your computer's hard disk so that the website can remember who you are.

A cookie will typically contain the name of the domain from which the cookie has come, the 'lifetime' of the cookie, and a value, usually a randomly generated unique number.

When you visit the website, we send you a cookie.

Cookies may be used in the following ways:

- to help us recognise you as a unique visitor when you return to the website.
- to compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website. We cannot identify you personally in this way.

Byrom plc only use the Google Analytics cookies for the sole purpose of gathering visitor statistics.