

## **BRIOCHE PASQUIER UK – PITCH BACK TO SCHOOL COMPETITION**

### **PRIVACY NOTICE**

Date of posting: July 5th, 2019

This privacy notice explains when and why we collect personal information about you in connection with the above competition and our related website at <https://pitchforeverypitch.co.uk>, how that information is used, to whom it may be disclosed and your data protection rights.

This notice was last updated on the date of posting that appears at the top of this page.

#### **About us**

For the purposes of applicable data protection laws, Brioche Pasquier U.K. Limited is the 'controller' of your personal information. This means we decide why and how your personal information is used and are responsible for protecting it. Please refer to the end of this notice for our contact and company information.

#### **Personal information we collect about you**

Information that you give to us. The personal information we collect and process about you will include your name, address, email address and phone number. Any information you provide to us is entirely voluntary, however if you do not provide this information to us, you cannot participate in the competition. **Please note that, as set out in our Terms, you must only submit to us personal information relating to individuals that you know and must ensure that you have obtained their prior permission to include their information in any entry you submit to us and have brought the information in this notice to their attention. We may ask you to prove that you have obtained this permission at any time.**

Information that we collect automatically. When you visit our website(s) we may automatically collect and process details of your visits to our Website and the resources that you access including, but not limited to, traffic data, location data, weblog statistics and other communication data. We collect the internet protocol (IP) address of your device and details regarding the type of device and browser software you use to access the competition website, details of your use of our competition website (namely traffic and location data, weblogs and statistical data, including where and when you clicked on certain parts of our website and details of the webpage from which you visited it), details regarding when and how you consented to receive marketing communications from us (including the time and date you provided your consent); and cookie, tracking pixel and beacon identification.

Information we collected from other sources. We collect and process your personal information if it is included in a competition entry made by a participant in the competition.

When we collect and store your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

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

#### **The purposes for which we use your personal information and the lawful basis we rely on**

Data protection laws require us to have a valid reason to process your personal information. The law refers to each reason as a 'lawful basis'. The purposes for which we use your personal information and the lawful basis on which we rely to process it for each purpose is as follows:

Where necessary for us to run the competition in accordance with its terms and conditions (i.e. to perform the terms of our contract). We will use your personal information to administer the competition in accordance with its Terms, including when corresponding with you about the competition.

Where you have provided consent. We use your personal information to contact you via email with marketing information about our products and services or our events, offers and promotions where you have provided us with your consent by opting-in. You may withdraw your consent for us to use your information in any of these ways at any time.

Where necessary to comply with our legal obligations. We will use your personal information to comply with our legal obligations including for the following purposes: for recording keeping, to comply with your

requests in connection with your privacy rights, including verifying your identity; to anonymise or delete your data when it is no longer required; to send you legal notices; to comply with court orders or other mandatory enforcement instructions; and to resolve complaints.

Where necessary to pursue a legitimate interest. We may use your personal information where it is necessary for us to pursue our legitimate interests as a business, or that of a third party, for the following purposes:

- Processing necessary for us to use your competition entries, including for publicity and advertising purposes: to use your personal information included in the competition entries we receive in any of the ways described in our Terms other than to administer the competition and comply with our legal obligations.
- Processing necessary for us to comply with industry standards: to publish your details (including your name and your county of residence) if you are a winner of the competition unless you object in accordance with your rights below; and
- Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively: for network and information security to protect your information; to prevent fraud and other criminal activities; for the purposes of corporate restructuring/reorganisation or business/asset sales; for efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records we hold about you; to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; to inform you of updates to our terms and conditions and policies; and for other general administration including managing any reports you make, your queries, or claims, and to send service messages to you.

#### **Others who may have access to your information**

We may also disclose your personal information to our suppliers, including third party service providers, subcontractors, in connection with the purposes set out above. Our suppliers include: marketing and packing agencies; magazine publications; THORPE PARK Resort, IT and online services providers, including database, email and document management/destruction and hosting services providers. When sending your information to suppliers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

#### **Transferring your information outside of Europe**

The information you provide to us will be transferred to and processed in the UK, the European Economic Area (EEA) and the USA. As the data protection laws in the USA are not the same as those in the UK and EEA, we take steps to ensure that appropriate security and other measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice. We use a third party hosting services provider based in the USA to host our competition website. This provider is subscribed to the EU-US Privacy Shield scheme and to ensure that your personal information is adequately protected when it is transferred to this provider, we will only make such transfers whilst the provider is subscribed to that scheme (or uses a replacement scheme or arrangement). For further information regarding this scheme, please visit the EU-US Privacy Shield website.

#### **Your rights**

You have the following rights (which may not always apply or be subject to certain circumstances and exemptions):

- to be informed about the processing of your personal data (this is what this statement sets out to do);
- to have your personal data corrected if it's inaccurate and to have incomplete personal data completed;
- to object to processing of your personal data;
- to withdraw your consent to processing your personal data where consent is being relied upon for data processing;
- to restrict processing of your personal data;
- to have your personal data erased;

- to request access to your personal data and information about how we process it;
- to move, copy or transfer your personal data (i.e. 'data portability'); and
- rights relating to automated decision making, including profiling.

To exercise these rights, please contact us using the details at the end of this notice.

You have the right to lodge a complaint with the Information Commissioner's Office (or, different, your local data protection regulator) where your personal information has or is being used in a way that you believe does not comply with data protection laws. However, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

#### **The period for which we hold your personal information**

The length of time for which we retain your personal information is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary. We may need your personal information for the purpose of establishing, bringing or defending legal claims, which, as stated above, is necessary for us to pursue our legitimate interest of operating the administrative and technical aspects of our business efficiently and effectively. For this purpose, we will retain your personal information for up to 7 years after the date it is no longer needed by us for any of the other purposes listed in this notice. The only exceptions to this are:

- in respect of your image or other social media content provided to us that you or we have published on our social media pages or websites, which we will retain and keep published indefinitely, unless you object;
- where the law requires us to hold your personal information for a longer period, or delete it sooner;
- where we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible;
- where we archive the information, in which case we will delete it in accordance with the end of our next deletion cycle; or
- you exercise your right (where it applies) to have the information erased or retained and we do not need to hold it in connection with any of the reasons permitted or required under the law.

#### **Company and contact information**

Please direct any queries about this notice or about the way we process your personal information by post to the following address: 8 Garamonde Drive, Wymbush, Milton Keynes, MK8 8DF.

Our company information is as follows: Brioche Pasquier U.K. Limited, a company incorporated in England, whose registered office address is: 8 Garamonde Drive, Wymbush, Milton Keynes, MK8 8DF.