

Privacy Policy v1.0

This Privacy Policy sets out how we, Recruitment Agency Expo, an event organised by Bluewater Events Ltd collect, store and use information about you when you use or interact with our website, www.recruitmentagencyexpo.com (our **website**) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 25th May 2018

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.

- **Data controller:** Navdeep Mann
- **Email address:** info@bluewaterevents.co.uk
- **Telephone:** 0208 230 0066
- **How we collect or obtain information about you:**
 - We will collect any information contained in any correspondence between you and us via contact forms on websites, and emails or telephone calls.
 - from your use of our website, using cookies and similar technologies, and
 - occasionally, from third parties.
- **Information we collect:** name, contact details, payment information e.g. your credit or debit card details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed our website (based on your IP address), company name or business name (if applicable), and any such information that is required to service your contract.

- How we use your information:** for administrative and business purposes (particularly to contact you and process orders you place with our company, to improve our business and website, to fulfil our contractual obligations, to advertise our goods and services, [to analyse your use of our website, and in connection with our legal rights and obligations. We may also use your data for the following purposes:

What data we use	The purpose of use:	The legal basis applicable:
Provide you with information that you have requested from us, in relation to events and publications we run, or other services we provide (for example online webinars and e-newsletters).	We will need to use your contact details to keep you updated about the products or services you have indicated you are interested in.	By specifically requesting information from us, you are consenting to us using your personal data for the purposes of communicating such information to you.
For general administration and organisation of our events, for example to contact you with information about an event or conference that you're exhibiting at or attending.	We will need to use your details for planning and logistics, to invoice you, to provide you customer service in relation to the event, and general administration of your attendance at the event.	Where you have registered to attend or exhibit at an event, we need to use your personal data in this way to perform our contractual obligations to you. Where you are attending an event but do not have a contract with us (for example you received free tickets), it is our legitimate interest to use your personal data for general administration and logistics of the event.
To keep in contact with you about other similar events or services of ours that may be of interest to you, or for research purposes after an event you have attended.	To keep you up to date on similar events or services you have previously purchased from us in the past. To analyse the effectiveness of our products and offerings to you.	It is our legitimate interest to keep you up to date on similar events of ours you have attended or exhibited at in the past. Where we rely on legitimate interests in this way, we will always offer an opt out, and unsubscribe option on any marketing information we send you.
Pass on your contact details to our logistics partners to enhance your experience at an event you have signed up to exhibit or sponsor at.	We engage logistic partners in order to enhance your experience at our events, such as engaging stand builders, electricity providers, carpeting, furniture, WIFI providers etc.	Where we need to share these details with such logistic partners in order to perform the contract we have with you, the legal basis would be the performance of a contract. In other circumstances, we have a legitimate interest to provide the details to our partners, because

		these services are required for a seamless exhibition experience, and it is in your interest to be provided with this information. If you prefer us not to share these details with our logistics partners, you can us indicate using the opt out box when you register your details, or let us know during the contracting process.
To assess the activity of our attendees at our events.	We assess how people move around and engage with our events. We do this using any apps you have activated or signed up to, and where you allow your badge to be scanned by staff at our events. We use this information for analytics, and to improve and enhance our events.	It is our legitimate interest to monitor the location and engagement of our attendees at our events.
Transfer your contact details to an Exhibitor or Sponsor if they scan your badge at one of our events.	The purposes for which exhibitors or sponsors will use your personal data will be communicated to you by the exhibitor or sponsor, when they make initial contact with you.	When you hand your badge to an exhibitor for them to scan you, you are consenting to your Personal Data being passed to the exhibitor or sponsor. If you do not wish for your information to be passed on, please do not scan your badge.
Analyse user traffic to measure use of our websites and improve their content.	We may use information such as your IP address for analytical purposes of our pages, this could also include improving the content of our websites and services.	We have identified web analytics as a legitimate interest of our business, and allow us to better meet your needs as a customer.
To comply with or abide by legal obligations or requirements.	We may need to use or process your personal data to comply with some legal requirements, an example being health and safety or fire safety at an event.	Where we need to process your data for these reasons, the legal basis will be compliance with a legal obligation.

- **Disclosure of your information to third parties:** only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter into with you, where required by law or to enforce our legal rights and such instances such as to operate our online event registration systems and/or payment systems; these entities will collect information directly from you on our behalf. We may engage third parties to operate event websites on our behalf; these entities will collect information directly from you about your visits to the website on our behalf.
- **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event):** No

- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business) and where you have not participated, attended or registered to attend or participate in one of our events, or otherwise engaged with us in four years, we will delete your data, unless we have an obligation to retain it for longer. For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled [How long we retain your information.](#)
- **How we secure your information:** using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary along with encryption of personal data, encrypted email, pseudonymisation and/or anonymisation of personal information.
- **Use of cookies and similar technologies:** we use cookies and similar information-gathering technologies such as web beacons on our website including essential, functional, analytical and targeting cookies. For more information, please visit our cookies policy here: www.recruitmentagencyexpo.com/legal
- **Transfers of your information outside the European Economic Area:** we will only transfer your information outside the European Economic Area if we are required to do so by law. Where we do so, we will ensure appropriate safeguards are in place e.g. the third parties we use who transfer your information outside the European Economic Area have self-certified themselves as compliant with] the EU-U.S. Privacy Shield
- **Your rights in relation to your information**
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - not to have significant decisions made about you based solely on automated processing of your information, including profiling
 - to complain to a supervisory authority
- **Sensitive personal information:** we do not knowingly or intentionall collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled [Sensitive Personal Information.](#)

Our details

The data controller in respect of our website is Recruitment Agency Expo, an event organised by Bluewater Events Ltd (04680703) of 220 Ellerdine Road, Hounslow, TW3 2PX.

Email address: info@bluewaterevents.co.uk

Telephone: 0208 230 0066

The data protection officer for the data controller is Navdeep Mann. You can contact the data protection officer by writing to our Data Protection Officer

If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Web server log information

We use a third party server to host our website called UK2 Group, the privacy policy of which is available here: <https://www.uk2.net/terms-and-conditions/gdpr-policy>. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system.

Our server is located in the United Kingdom and, accordingly, your information is transferred outside the European Economic Area (EEA). For further information and information on the safeguards used, please see the section of this privacy policy entitled [Transfers of your information outside the European Economic Area](#).

Use of website server log information for IT security purposes

We access log data from our website server and/or our third party hosting provider collect(s) and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our and a third party's legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: we and our third party hosting provider have a legitimate interest in using your information for the purposes of ensuring network and information security.

We use the information gathered from the analysis of this information to improve our website. For example, we use the information gathered to change the information, content and structure of our website and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: improving our website for our website users and getting to know our website users' preferences so our website can better meet their needs and desires.

Cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies and similar technologies on our website, including essential, functional, analytical and targeting cookies including web beacons. For further information on how we use cookies, please see our cookies policy which is available here: www.recruitmentagencyexpo.com/legal

You can reject some or all of the cookies we use on or via our website by changing your browser settings or non-essential cookies by using our cookie control tool, but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our cookies policy.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email / Contact Form

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third party email provider to store emails you send us. Our third party email provider is Microsoft Exchange and/or Microsoft Office 365. Their privacy policy is available here: <https://www.microsoft.com/en-us/trustCenter/privacy/gdpr>

Emails you send us will be stored within and/or outside the European Economic Area on our third party email provider's servers. For further information please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

We do not record phone calls

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Information about your call, such as your phone number and the date and time of your call, is processed by our third party telephone service provider British Telecom (BT)

Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

E-Newsletter

When you sign up for our e-newsletter on our website or opt to receive news, offers and any other correspondence from us, we collect Name, Email Address & your marketing preferences.

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you our e-newsletter by signing up to receive it using the steps described above.

Use of web beacons and similar technologies in emails

We use technologies such as web beacons (small graphic files) in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through which our emails achieve. We will only use web beacons in our emails if you have consented to us doing so.

For more information on how we use web beacons in our e-newsletter emails, see our cookies policy which is available here: www.recruitmentagencyexpo.com/legal

Registering on our website

When you register and create an account on our website, we collect the following information: *name, email address, IP address* and any other information you provide to us when you complete the registration form including any optional information.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: registering and administering accounts on our website to provide access to content and facilitate the running and operation of our business.

Transfer and storage of your information

Information you submit to us via the registration form on our website will be stored within the European Economic Area on our third party hosting provider's servers. Our third party hosting provider is PIXAFUSION Digital. Their privacy policy is available here: www.pixafusion.digital/legal

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Optional information

We also collect optional information from you, such as your phone number, information about how you heard about us any additional optional information which you collect from customers at time of registration/visit. We also ask you if you would like to receive marketing communications from us. For further information, see 'Marketing communications' in this section below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: Finding out how a customer heard about you to improve your business' advertising methods or to be able to contact the customer by phone where (if necessary) in relation to their order

AND

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Legitimate interests: you consent to us processing any optional information you provide by submitting that information to us.

Marketing communications

Our similar goods and services

You can opt-out from receiving marketing communications in relation to our goods and which are similar to those which you purchase from us, by visiting our preference centre and/or ticking a box to opt out on any communication you receive.

We will send you marketing communications in relation to similar goods and services if you do not opt out from receiving them.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: direct marketing and advertising our products and services.

Transfer and storage of your information

We use a third-party service to administer our mailing list such as MailChimp and/or Sign-up.to

Information you submit to subscribe for our e-newsletter will be stored within and/or outside the European Economic Area. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]

Use of web beacons and similar technologies in emails

We use technologies such as web beacons (small graphic files) by Mailchimp and/or Sign-up.to in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates which our emails achieve. We will only use web beacons and similar technologies in our emails if you have consented to us doing so.

For more information on how we use web beacons in our emails, see our cookies policy which is available here: www.recruitmentagencyexpo.com/legal

For more information about our third party mailing list provider and they use web beacons, please see their privacy policy which is available here: www.recruitmentagencyexpo.com/legal

Mailchimp: <https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation>

Sign-up.to: <https://www.signupto.com/legal/>

Our goods and services

You can opt in to receiving marketing communications from us in relation to our goods and services by email, text message, phone, and/or post by ticking a box indicating that you would like to receive such communications

We will send you marketing communications in relation to our goods and services only if you opt-in to receive them.

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you information about our goods and services by signing up to receive such information in accordance with the steps described above.

Third Party Registration Forms

When you register to attend and/or visit a show, we collect the following information: name, address, contact details any other information you provide to us when you complete the registration form including any optional information. You can find our Third Party providers Privacy Policy by visiting: <https://jonas.events/legal/privacy>

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: registering and administering accounts on our website to provide access to content and facilitate the running and operation of our business.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

Generally we do not receive information about you from third parties.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as the electoral register, Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website if you have one)

In certain circumstances will also obtain information about you from private sources, both EU and non-EU.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected

You can find out more about our use of cookies and similar technologies (including the legal basis on which we use them) and how to opt out from them in our cookies policy, which is available here: <http://recruitmentagencyexpo.com/legal>

Profiling

Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Use of profiling for web analytics

Our web analytics service, Google Analytics uses collects information such as your location (based on your IP address) and your behaviour (based on cookies) when you access our website (such as the pages you visit and what you click on) We will only process information from cookies if you have consented to us setting cookies on your computer in accordance with our cookies policy. Information collected about you, once collected is anonymised and stored on an aggregate basis.

Logic involved: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our

website and our products), how to improve our website and how to advertise and market our services to them.

Significance and envisaged consequences: cookies will be used to track and store information about your behaviour and device on our website (unless you have opted out from receiving such cookies) and your location will be analysed based on your IP address. We may target advertisements based on the level of interest we receive from certain visitors and their behaviour on our website.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Use of profiling in marketing emails

We use web beacons in our marketing emails to analyse who opens our emails and what actions they take (for example, what they click on). We will only process information from web beacons or if you have consented to their use in accordance with our cookies policy

Logic involved: by analysing how our email recipients respond to our emails, we are able to improve the content and effectiveness of our emails and gauge who is most interested.

Significance and envisaged consequences: your behaviour when you open our emails will be tracked using small gif files (web beacons) and including open rates, click through rates.

How to object: by changing your preferences in any emails you receive by unchecking the content tick box

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: analysing the level of engagement and effectiveness of our marketing emails and content

Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who may process your information for us on our behalf.

We do not display the identities of any of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly via our contact form or by email and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Google Inc. Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>)

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: running and managing our business efficiently.

Sharing your information within our business' group of companies, for internal administrative purposes, including client, customer and employee information.

Legal basis for processing: necessary to perform a contract [or to take steps at your request prior to entering into a contract] (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need to share your information with other companies in order to be able to meet our contractual obligations to you [or to take steps at your request prior to entering a contract, for example because of the services or information you have requested.

We do not display the identities of all of the other third parties we may share information with by name for security and competitive reasons. If you would like further information about the identities of such third parties, however, please contact us directly via our contact form or by email and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such third parties, for example).

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money laundering matters

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for six (6) years.

Order information: when you place an order for goods and services, we retain that information for six (6) years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for a further six (6) years, after which point we will delete your information.

E-Newsletter: we retain the information you used to sign up for our e-newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our e-newsletter service, whichever comes earlier.

Registration information: we retain the information you used to register for the event for as long as you remain subscribed (i.e. you do not unsubscribe) or as long as necessary to keep you up to date on similar events and shows that you showed a interest in previously

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);

- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website.
- only transferring your information via closed system or encrypted data transfers; and
- insert any additional methods e.g. other technological measures or pseudonymisation.

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the European Economic Area

Most of your information is stored in the European Economic Area (EEA) countries. When using third-party software, your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

Server log information

Information collected when you visit our website is transferred outside of the EEA and stored on the servers of our third party hosting company PIXAFUSION Digital You can access their privacy policy here: www.pixafusion.digital/legal

Safeguard(s) used: our third party hosting provider has self-certified its compliance with the EU-U.S. Privacy Shield

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to our Data Protection Officer.

to request access to your information and information related to our use and processing of your information;

- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.
- the right not to be subject to a decision based solely on automated processing, including profiling which produces legal affects concerning you or similarly significantly affects you]

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Requests (including for data subject access) will be complied with, usually within one month of receipt. A charge will made of £25.00 for dealing with requests relating to these rights to cover administrative fees and/or other costs occurred internally.

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34

of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by to our Data Protection Officer object to us using or processing your **information where we use or process it in order to carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and

- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
- **sending an email** to info@bluewaterevents.co.uk asking that we stop sending you marketing communications or by including the words "OPT OUT".

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled [How to accept or reject cookies](#) in our cookies policy, which is available here: www.recruitmentagencyexpo.com/legal

Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time in order to provide you with a better customer service experience and to comply with any regulations.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will update the effective date at the start of the document.

Copyright, credit and logo

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Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted a privacy policy template provided by GDPR Privacy Policy as the basis for this Privacy Policy.