Privacy & Cookies Policy

This privacy policy applies between you, the User of this Website and The Pink Elephant Events Ltd, the owner and provider of this Website. The Pink Elephant Events Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

This privacy policy should be read alongside, and in addition to, our <u>Terms and Conditions</u>. Please read this privacy policy carefully.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to The Pink Elephant Events Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the Cookies Policy (Cookies);
Data Protection Laws	any applicable law relating to the processing of Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
GDPR	the General Data Protection Regulation (EU) 2016/679;
THE PINK ELEPHANT EVENTS LTD, we or us	The Pink Elephant Events Ltd, a company whose office is at 20 - 22 Wenlock Road, London, N1 7GU;
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
User or you	any third party that accesses the Website and is not either (i) employed by The Pink Elephant Events Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to The Pink Elephant Events Ltd and accessing the Website in connection with the provision of such services; and
Website	the website that you are currently using, <u>www.thepinkelephant.co.uk</u> , and any sub- domains of this site unless expressly excluded by their own terms and conditions.

- 2. In this privacy policy, unless the context requires a different interpretation:
 - a. the singular includes the plural and vice versa;
 - b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
 - c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
 - d. "including" is understood to mean "including without limitation";
 - e. reference to any statutory provision includes any modification or amendment of it;
 - f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

- 3. This privacy policy applies only to the actions of us and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
- 4. For purposes of the applicable Data Protection Laws, we are the "data controller". This means that we determine the purposes for which, and the manner in which, your Data is processed.
- 5. This Website is not intended for children and we do not knowingly collect data relating to children.

Data collected

- 6. We may collect the following Data, which includes Data, from you:
 - a. name;
 - b. contact Information such as email addresses and telephone numbers;
 - c. demographic information such as postcode, preferences and interests;
 - d. financial information such as credit / debit card numbers;
 - e. IP address (automatically collected);
 - f. web browser type and version (automatically collected);
 - g. operating system (automatically collected);
 - h. a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);
 - i. food preferences and allergy requirements of you and any guests that you invite to your event;

j. Marketing and communications data includes your preferences in receiving marketing from us; in each case, in accordance with this privacy policy.

We also collect, use and share 'aggregated data' such as statistical or demographic data for any purpose. Aggregated data could be derived from your Data but is not considered Data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate data about how you use our products or services, to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your Data so that it can directly or indirectly identify you, we treat the combined data as Data which will be used in accordance with this privacy policy. We do not collect any special categories of 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.

How we collect Data

- 7. We collect Data in the following ways:
 - a. data is given to us by you ; and
 - b. data is collected automatically.

Data that is given to us by you

- 8. We will collect your Data in a number of ways, for example:
 - a. when you contact us through the Website, through social media, by telephone, post, e-mail or through any other means;
 - b. when you order our products or services;
 - c. when you complete surveys that we use for research purposes (although you are not obliged to respond to them);
 - d. when you enter a competition or promotion through a social media channel;
 - e. when you make payments to us, through this Website or otherwise;
 - f. when you elect to receive marketing communications from us;
 - g. when you use our services;

in each case, in accordance with this privacy policy.

Data that is collected automatically

- 9. To the extent that you access the Website, we will collect your Data automatically, for example:
 - a. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 - b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

Our use of Data

- 10. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 - a. where we need to perform the contract we are about to enter into or have entered into with

you;

- b. internal record keeping;
- c. improvement of our services;
- d. transmission by email of marketing materials that may be of interest to you;
- e. contact for market research purposes which may be done using email. Such information may be used to customise or update the Website; or
- f. to comply with a legal obligation.

in each case, in accordance with this privacy policy.

- 11. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
- 12. For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:
 - a. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
 - b. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.
 - c. if you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
- 13. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 14. We may use your Data to show you our adverts and other content on other websites. If you do not want us to use your data to show you our adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed "Cookies" below).

Who we share Data with

- 15. We may share your Data with the following groups of people for the following reasons:
 - a. our employees, agents and/or professional advisors in order to obtain advice from professional advisers;
 - b. third-party service providers who provide services to us which require the processing of Data in order to assist in carrying out services for you;
 - c. third-party service providers in receipt of any shared data to perform functions on our behalf to help ensure the website runs smoothly;
 - d. third-party payment providers who process payments in order to enable such third-party payment providers to process user payments and refunds;

in each case, in accordance with this privacy policy.

Keeping Data secure

- 16. We will use technical and organisational measures to safeguard your Data, for example:
 - a. we store your Data on secure servers.
 - b. payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we or any third-party payment provider uses this technology.
- 17. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via <u>e-mail</u>.
- 18. We have put in place procedures to deal with any suspected Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- 19. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <u>www.getsafeonline.org</u>. Get Safe Online is supported by HM Government and leading businesses.

Data retention

- 20. We will only retain your Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 21. To determine the appropriate retention period for Data, we consider the amount, nature and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 22. By law we have to keep basic information about our customers (including contact, Identity, financial and transaction data) for 6 years after they cease being customers for tax purposes.
- 23. In some circumstances you can ask us to delete your Data: see your legal rights below for further information.
- 24. In some circumstances we will anonymise your 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.

Your rights

- 25. You have the following rights in relation to your Data:
 - a. **Right to access** the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

- b. Right to correct the right to have your Data rectified if it is inaccurate or incomplete.
- c. Right to erase the right to request that we delete or remove your Data from our systems.
- d. **Right to restrict our use of your Data** the right to "block" us from using your Data or limit the way in which we can use it.
- e. Right to data portability the right to request that we move, copy or transfer your Data.
- f. **Right to object** the right to object to our use of your Data including where we use it for our legitimate interests.
- 26. You will not have to pay a fee to access your 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. Alternatively, we could refuse to comply with your request in these circumstances.
- 27. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via <u>e-mail</u>.
- 28. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at https://ico.org.uk/.
- 29. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

International Transfers

- 30. Data which we collect from you may be stored and processed in and transferred to countries outside of the UK. For example, this could occur if our servers are located in a country outside the UK or one of our service providers is situated in a country outside the UK.
- 31. Whenever we transfer your Data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - we will only transfer your Data to countries that have been deemed to provide an adequate level of protection for personal data; and
 - where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- 32. Please contact us if you want further information on the specific mechanism used by us when transferring your Data out of the UK.

Links to other websites

33. This Website may, from time to time, provide links to other websites. Whilst we may receive financial benefits from some of the websites that we link to, we have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

- 34. We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of The Pink Elephant Events Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
- 35. We may also disclose Data to a prospective purchaser of our business or any part of it.
- 36. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Cookies

- 37. This Website may place and access certain Cookies on your computer. The Pink Elephant Events Ltd uses Cookies to improve your experience of using the Website and to improve our range of services. The Pink Elephant Events Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
- 38. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
- 39. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling us to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

40. This Website may place the following Cookies:

- 41. You can find a list of Cookies that we use in the Cookies Schedule below.
- 42. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
- 43. You can choose to delete Cookies at any time; however you may lose any information that enables

you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

- 44. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
- 45. For more information generally on cookies, including how to disable them, please refer to <u>www.aboutcookies.org</u>. You will also find details on how to delete cookies from your computer.

General

- 46. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 47. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 48. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 49. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

50. We reserve the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

Cookies

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Functional and Required Cookies

We use the following functional and required cookies:

Name	Туре	Duration	Purpose
Crumb	Cookie	Session	Prevents cross-site request forgery (CSRF).
siteUserCrumb	Cookie	3 years	Prevents cross-site request forgery (CSRF) for logged in site users.

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RecentRedirect	Cookie	30 minutes	Prevents redirect loops if a site has custom URL redirects. Redirect loops are bad for SEO.
CART	Cookie	2 weeks	Shows when a visitor adds a product to their cart
hasCart	Cookie	2 weeks	Tells Squarespace that the visito has a cart
Locked	Cookie	Session	Prevents the password-protecte screen from displaying if a visite enters the correct site-wide password.
SiteUserInfo	Cookie	3 years	Identifies a visitor who logs into a customer account
SiteUserSecureAuthToken	Cookie	3 years	Authenticates a visitor who logs into a customer account
Commerce-checkout- state	sessionstorage	Session	Stores state of checkout while t visitor is completing their order PayPal
squarespace-popup- overlay	localstorage	Persistent	Prevents the promotional pop- up from displaying if a visitor dismisses it
squarespace- announcement-bar	localstorage	Persistent	Prevents the announcement bar from displaying if a visitor dismisses it
ss_sd	Cookie	Session	Ensures that visitors on the Squarespace 5 platform remain authenticated during their sessions.
Test	Cookie	Session	Investigates if the browser supports cookies a prevents errors.
squarespace-likes	localstorage	Persistent	Shows when you've already "liked" a blog post.
CHECKOUT_WEBSITE	Cookie	Session	Identifies the correct site for checkout when Checkout on Yo Domain is disabled.
AWSALB, AWSALBCORS	Cookie	1 week	Load balancing
PHPSESSID	Cookie	1 month	Session tracking
remember_client	Cookie	365 days	Login by Scheduling Client (only client has account)
_client_acloggedin	Cookie	January 1, 2025	Login by Scheduling Client (only client has account)

_acloggedin	Cookie	January 1, 2025	Login by Scheduling Client (only if client has account)
TZ	localstorage	Persistent	To remember Scheduling Client's preferences for time zone to display potential schedule correctly
			To enable Scheduling Clients to enter an address and receive address suggestions so that address field is a structured data field and to make scheduling go
algoliasearch-client-js	localstorage	Persistent	quicker.

Analytics and Performance Cookies

We use the following analytic and performance cookies:

Cookie Name	Duration	Purpose
ss_cid	2 years	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cvr	2 years	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cvisit	30 minutes	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cvt	30 minutes	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cpvisit	2 years	Identifies unique visitors and tracks a visitor's sessions on a site
ss_cookieAllowed	30 days	Remembers if a visitor agreed to placing Analytics cookies on their browser if a site is restricting the placement of cookies