

Last updated: 25th May 2018

This is the privacy policy for LONDON THEATRE BOOKINGS (“we”, “us”, “our”, “company” or “organization”).

We are committed to respecting your privacy. We recognize your need for control of personal information that you share with us. Personal information is any information that is associated with your name or identity. This Privacy Policy applies to www.londontheatrebookings.com and www.thetheatrecafe.co.uk (our "**Sites**").

This Privacy Policy describes how we collect and use the personal information you provide and that we collect about you, both through the Sites and generally. It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information. It is your responsibility to review this Privacy Policy carefully, especially before providing us any personal information. The use of information collected through our service shall be limited to the purpose of providing the service for which you have provided the information.

By engaging with our Sites, you acknowledge you have read and understood this privacy policy.

For the purposes of European Economic Area data protection law, (the "**Data Protection Law**"), the data controller is London Theatre Bookings and can be contacted using the details at the end of this Privacy Policy [hyperlink to contact us section].

This Privacy Policy sets out:

- Information we collect about you
- Cookies and other technologies
- How we use your information
- Our promotional updates and communications
- Who we give your information to
- Where we store your information
- Child safety
- How we protect your information
- How long we keep your information
- Your rights
- Changes to this policy
- Contact us

Information we collect about you

We will collect and process the following personal data from you:

Information you give us

This is information about you that you give us directly when you interact with us.

Additional Information:

This is information about you that you give us by filling in forms on our Sites or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our Sites, subscribe to our services, search for a product or service, place an order on our Sites participate in discussion boards or other

social media functions on or via our Sites, enter a competition, promotion or survey, submit a query, and when you report a problem with our Sites

The information you give us may include your name, address, e-mail address and phone number, login and password details.

It may also include employment details if you send us a Cover Letter, resumé or other details of your employment history in connection with an advertised job vacancy or a general enquiry regarding employment opportunities with us.

Information we collect about you from your use of our Sites:

We will automatically collect information from you each time you visit our Sites.

This includes:

- Technical information
- Information about your visit
- Location data

Additional Information

Technical information may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; Information about your visit may include the full Uniform Resource Locators (URL), clickstream to, through and from our Sites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.

Location data - we collect information through the Sites as to your real-time location to provide location services where requested or agreed to by you in order to deliver content, that are dependent on knowing where you are. This information may also be collected in combination with an identifier associated with your device to enable us to recognise your mobile browser or device when you return to the Site.

Delivery of location services will involve reference to one or more of the following: (a) the coordinates (latitude/longitude) of your location; (b) look-up of your country of location by reference to your IP address against public sources; and/or (c) your Identifier for Advertisers (IFA) code for your Apple device, or the Android ID for your Android device, or a similar device identifier. See Cookies and other technologies for more information on the use of cookies and device identifiers on the Sites.

Information we receive from other sources.

This is information we receive about you:

- If you use any of the services we provide.
- From third parties we work closely with (customers to which we provide services which in turn provide service to you).

Additional Information:

In this case we will have informed you when we collected that data if we intend to share your data internally and combine it with data collected on our Sites. We will also have told you for what purpose we will share and combine your data.

We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, and search information providers).

Cookies and other technologies

Our Sites use cookies and/or other similar technologies such as device-IDs, pixel tags or web beacons to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies and similar technologies enable you to be remembered when using that computer or device to interact with websites and online services and can be used to manage a range of features and content as well as storing searches and presenting personalised content.

Our Sites use cookies and similar technologies to distinguish you from other users of our Sites. This helps us to provide you with a good experience when you browse our Sites and also allows us to improve our Sites.

Most web browsers automatically accept cookies and similar technologies, but if you prefer, you can change your browser to prevent that and your help screen or manual will tell you how to do this. We also give you information about how to disable cookies here [*insert link to section*]. However, you may not be able to take full advantage of our Sites if you do so.

A number of cookies and similar technologies we use last only for the duration of your web or app session and expire when you close your browser. Others are used to remember you when you return to our Sites and will last for longer.

We use these cookies and other technologies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, where you have consented to their use.

Additional Information:

We use cookies and/or other similar technologies, such as tracking GIFs, web beacons pixel codes and in-app IDs, either alone or in combination with each other to create a unique device ID.

We use the following types of cookies:

- **Strictly necessary** cookies. *These are cookies that are required for the operation of our Sites and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our Sites.*
- **Analytical/performance** cookies. *They allow us to recognise and count the number of visitors and to see how visitors move around our Sites when they are using them. This helps us for our legitimate interests of improving*

the way our Site 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 Sites. This enables us, subject to your choices and preferences, to personalise our content and remember your preferences (for example, your choice of language or region).
- **Targeting/Advertising** 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 subject to your choices and preferences to make our Sites and the advertising displayed on it more relevant to your interests. **We may also share this information with third parties for this purpose.**

We may also work with advertising networks that gather information about your interaction with the content on our Sites and on information on other websites and services you visit. This may result in you seeing our advertisements when you visit other websites and services of third parties. For more information about how to turn this feature off see below or visit <http://www.youronlinechoices.co.uk> in the UK or in the US <http://optout.networkadvertising.org/#/>

Disabling cookies

The effect of disabling cookies depends on which cookies you disable but, in general, the Sites may not operate properly if all cookies are switched off.

If you want to disable cookies on our Sites, you need to change your web browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below: -

For Microsoft Internet Explorer:

1. Choose the menu "tools" then "Internet Options"
2. Click on the "privacy" tab
3. Select the setting the appropriate setting

For Google Chrome:

1. Choose Settings> Advanced
2. Under "Privacy and security," click "Content settings".
3. Click "Cookies"

For Safari:

1. Choose Preferences > Privacy
2. Click on "Remove all Website Data"

For Mozilla Firefox:

1. Choose the menu "tools" then "Options"
2. Click on the icon "privacy"
3. Find the menu "cookie" and select the relevant options

For Opera 6.0 and further:

1. Choose the menu Files"> "Preferences"
2. Privacy

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the Site.

Except for essential cookies, all cookies used on our Sites will expire after 2 years.

Log Files

As is true of most websites, we gather certain information automatically and store it in log files. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our Sites (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data.

How we use your information

You can see a full list of the types of data we process through our Sites, the purpose for which we process it and the lawful basis on which it is processed here.

We use information held about you in the following ways:

Information you give to us:

We will use this information to:

- Provide you with information about our services we feel may interest you, if you have given your consent to receiving marketing material from us at the point we collected your information, where required by law or otherwise in our legitimate interests provided these interests do not override your right to object to such communications. See 'Our promotional updates and communications'.
- Ensure in our legitimate interests that:
 - content from our Sites are presented in the most effective manner for you and for your computer.
 - we provide you with the information, products and services that you request from us.

Information we collect about you from your use of our Sites

We will use this information in our legitimate interests, where we have considered these are not overridden by your rights:

- To administer our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To keep our Sites safe and secure.
- For measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

- To improve our Sites to ensure that content is presented in the most effective manner for you and for your computer.

Information we receive from other sources

We may combine information from other sources with information you give to us and information we collect about you in our legitimate interests (where we have considered that these are not overridden by your rights).

Our promotional updates and communications

Where permitted in our legitimate interest or with your prior consent where required by law, we will use your personal information for marketing analysis and to provide you with promotional update communications by email about our products/services.

You can object to further marketing at any time by checking and updating your contact details within your account, or selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you, or by sending us an email to enquiries@londontheatrebookings.com

Who we give your information to

We may give your information to:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal data under this policy.
- Selected third parties.

Additional Information:

Our selected third parties may include:

- *Organisations who process your personal data on our behalf and in accordance with our instructions and the Data Protection Law. This includes in supporting the services we offer through the Sites in particular those providing website and data hosting services, providing fulfilment services, distributing any communications we send, supporting or updating marketing lists, facilitating feedback on our services and providing IT support services from time to time. These organisations (which may include third party suppliers, agents, sub-contractors and/or other companies in our group) will only use your information to the extent necessary to perform their support functions.*
- *Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We may make use of the personal data we have collected from you to enable us to display our advertisements to you on other websites and subject to the cookie section of this policy.*
- *Analytics and search engine providers that assist us in the improvement and optimisation of our Sites and subject to the cookie section of this policy (this will not identify you as an individual).*

- *Business partners who jointly with us provide services to you and with whom we have entered into agreements in relation to the processing of your personal data.*
- *Payment processing providers who provide secure payment processing services.*

We will disclose your personal information to third parties:

- *In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets subject to the terms of this Privacy Policy.*
- *If our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.*

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of supply terms and other agreements with you; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

Where we store your information

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**") that may not be subject to equivalent Data Protection Law. In particular, we may transfer personal information through or to the United States, Hong Kong, and the United Kingdom. Due to the global nature of the internet infrastructure, the information that you provide to us may be transferred in transit to other countries, including but not limited to the United States, Hong Kong and/or the United Kingdom. In connection with any such transmission, we will take the steps outlined in this Privacy Policy to protect your information.

Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognized legal adequacy mechanism (see below on *Privacy Shield*), and that it is treated securely and in accordance with this privacy policy.

More information:

We may transfer your personal information outside the EEA:

- *In order to store it.*
- *In order to enable us to provide services to you and enable the contract you enter into to be fulfilled. This includes order fulfilment, processing of payment details, and the provision of support services.*
- *Where we are legally required to do so.*
- *In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.*

EU – U.S. Privacy Shield and Swiss - U.S. Privacy Shield

London Theatre Bookings Ltd has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. They are committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List. <https://www.privacyshield.gov>

London Theatre Bookings Ltd is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. They comply with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, London Theatre Bookings Ltd is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, London Theatre Bookings Ltd may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Child Safety

We will not ask for information from children under 13 years of age. Teenagers should ask their parents for permission before sending any information about themselves (name, address, e-mail address, etc.) to us or anyone else over the Internet.

How we protect your information

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our Sites may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

Our Sites include Social Media Features, such as Facebook and Twitter buttons. These features may collect your IP address, which page you are visiting on our Site, and may set a Cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Sites. Your interactions with these features are governed by the privacy policy of the company providing it.

How long we keep your information

We retain personal data for as long as you have an account with us in order to meet contractual obligations to you and for six years after that to identify any issues and resolve any legal proceedings. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

Your rights

- If you are based in the EU you have the right under certain circumstances:
 - to be provided with a copy of your personal data held by us;
 - to request the rectification or erasure of your personal data held by us;
 - to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
 - to object to the further processing of your personal data, including the right to object to marketing;
 - to request that your provided personal data be moved to a third party.
- Wherever you are based you may:
 - opt out at any time from allowing further access by us to your location data in the settings of the device you use to access the Sites.
 - update or delete a testimonial you have allowed us to publish on the Sites, you can contact us at enquires@londontheatrebookings.com and
 - Where the processing of your personal information by us is based on consent (for example If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you), you have the right to withdraw that consent without detriment at any time by contacting us enquiries@londontheatrebookings.com

We may also send you service related email announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email. You do not have an option to opt out of these emails, which are not promotional in nature.

You can also exercise the rights listed above at any time by contacting us at [insert details of Data Protection Officer's email address or other email contact].

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html). The Information Commissioner is the

supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

Changes to this policy

Any changes we make to our privacy policy in future will be posted on this page and, in relation to substantive changes, may be notified to you by e-mail.

Contact Us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

J&J DAVEY LTD T/A LONDON THEATRE BOOKINGS LTD
 1 CRANBOURN ALLEY
 LONDON
 WC2H 7AW

0207 851 0300

enquiries@londontheatrebookings.com

Purpose and lawful basis for processing of personal data

This table sets out:

- What personal data we process
- What we use that data for
- The lawful basis for the processing

It forms part of our privacy policy [link] which you should also read.

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 manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (including testimonials)	(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)

<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(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)</p>
<p>To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(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</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>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)</p>
<p>To use data analytics to improve our Sites, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>