

INTRODUCTION

Welcome to the First Access Entertainment Limited (“**First Access**”) privacy notice. It sets out how we look after your personal data (i.e. data that can identify you) when you interact with us and the acts we represent (“**our Roster**”) and tells you about your privacy rights and how the law protects you.

This privacy notice aims to give you information on how First Access collects and processes your personal data through our digital platforms, including any data you may provide through this website, social media, when you sign up to our newsletter, any of our Roster’s newsletter, purchase a product or service or take part in a competition.

We do not knowingly collect data relating to children, without parental consent.

It is important that you read this privacy notice together with any other notice we may provide on specific occasions so that you are fully aware of how and why we are using your data.

1. WHO WE ARE

CONTROLLER

First Access is made up of two different legal entities:

- First Access Entertainment Limited (UK)
- First Access Entertainment, LLC (California)

This privacy notice is issued on behalf of all First Access entities so when we mention “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the First Access group responsible for processing your data. First Access Entertainment Limited is the controller of any personal data held by the First Access group of companies.

If you have any questions about this privacy notice or about your personal data you may contact us using the details set out below.

CONTACT DETAILS

First Access Entertainment Limited,
a company incorporated in England and Wales with number 09790120
Grove Studios
Adie Road
London, ENGLAND
W6 0PW

opportunities@firstaccessent.com

Should you have any concerns regarding our management of your personal data please contact us and we will do our best to address them. You may make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 21 May 2018. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current so please let us know if any of your personal data changes.

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications, which we do not control. We encourage you to read the privacy notice of any of those sites or applications to confirm how they will process your personal data.

2. THE DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Your Identity** includes your name, any username or similar identifier, title, date of birth and gender.
- **Your Contact Details** includes your billing address, delivery address, social media handle, email address and telephone numbers.
- **Your Financial Details** includes the last 4 digits of any payment card you use to purchase products or services from us.
- **Your Purchases** includes details about payments to and from you and other details of products and services you have browsed, ordered or purchased from us or parties providing product or services on our behalf.
- **Your Technical Device** includes your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our digital platforms, screen size and language settings.
- **Your Online Profile** includes your username and password, purchases or orders made by you, your interests, preferences, correspondence and feedback.
- **Your Usage** includes information about how you use and access our digital platforms, products and services.
- **Your Communications** includes any time you get in touch with us (including by email, messaging services, phone or post) or interact with any of our or our Roster's platforms, such as social media pages, posts and messaging groups, whatsapp groups and competition entries.
- **Your Marketing** includes your preferences in receiving marketing from us and third parties, including service providers working on projects for our Roster, such as music distributors, merchandise partners and various promotional services.

Providing your personal data may be required for us to supply our products, services, promotions or marketing information. If you are not willing to supply certain personal data to us, it may limit our ability to supply these to you.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your Identity, Contact, Purchase, Online Profile, Marketing and Communications data by filling in forms or by corresponding with us online or by phone, email, messaging or otherwise. This includes personal data you provide when you:
 - browse or purchase our products;
 - create an account on our website;
 - sign up to our newsletter or any of our Roster's newsletters;
 - submit your CV or a speculative job application;
 - request marketing to be sent to you;
 - join or participate in any marketing acts by us, for example a social media group;
 - enter a competition, promotion or survey; or
 - contact or interact with us.
- **Automated technologies or interactions.** As you interact with our digital platform, we may automatically collect Technical Device data about your equipment, browsing actions and patterns. If you use links supplied by us we may also collect information on your music and content consumption through other platforms such as YouTube and Spotify. We collect this personal data by using cookies and other similar technologies. We use these cookies to personalise your experience and to deliver targeted advertising to you through other websites you may visit.

- **Third party sources.** We may receive personal data about you from various third parties as set out below:
 - Technical Device and Usage data from analytics providers, such as Google Analytics based outside the EU.
 - Identity, Contact, Online Profile, Marketing, Usage, Financial and Transaction data from providers of technical, payment and delivery services, some based outside the EU.
 - Marketing and Usage data from any service providers we use in connection with our Roster, such as Linkfire.
 - Online Profile data taken from publicly available social media platforms, based outside the EU.
 - Identity and Contact Data from parties connected with the activities of our Roster, for example former artist managers.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform any contract we are about to enter into or have entered into with you (for example, where you have placed an order or entered a competition with us).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (please contact us if you would like further information on how we make this assessment). Our legitimate interest means activities related to the conduct and management of our business.
- Where we need to comply with a legal or regulatory obligation.

Please contact us if you would like more information about the types of lawful basis that we will rely on to process your personal data. Generally, we do not rely on consent as a legal basis for processing your personal data.

You have the right to withdraw consent to marketing at any time by [Contacting us](#).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

In the below table we have a list of activities we carry that involve some form of processing of your personal data. The data

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, user or subscriber	(a) Identity (b) Contact (c) Marketing (d) Technical	Necessary for our legitimate interest
To administer and deliver any order for products and services you make	(a) Identity (b) Contact (c) Marketing (d) Purchases (e) Communications	Performance of a contract with you

	(f) Financial Data	
To notify you about changes to our terms or privacy policy	(a) Identity (b) Contact	Necessary to comply with a legal obligation
To enable you to partake in a prize draw, competition or complete a survey and for us to administer the same	(a) Identity (b) Contact (c) Online Profile (d) Usage (e) Marketing (f) Communications	Necessary for our legitimate interests
To administer, maintain and protect our business, our digital platforms and our Roster's digital platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests
To deliver relevant digital content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Online Profile (d) Usage (e) Marketing (f) Communications (g) Technical	Necessary for our legitimate interests
To use data analytics to improve our digital platforms, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests
To make suggestions and recommendations to you about products, services or events related to us or our Roster that may be of interest to you	(a) Identity (b) Contact (c) Online Profile	Necessary for our legitimate interests

	(d) Usage (e) Marketing (f) Communications	
To measure our performance and the performance of our Roster	(a) Identity (b) Purchases (c) Online Profile (d) Usage	Necessary for our legitimate interests
To develop and implement direct and indirect marketing campaigns	a) Identity (b) Contact (c) Online Profile (d) Usage (e) Marketing (f) Communications (g) Technical Device	Necessary for our legitimate interests

MARKETING

If at any time you decide that you do not wish to receive marketing communications from us or those providing services on our behalf, you may either use the unsubscribe function on any recent communication from us, or you may contact us via opportunities@firstaccessent.com.

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

You will receive marketing communications from us if you have requested information from us, signed up to newsletters or notifications or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside the First Access group of companies for marketing purposes unrelated to First Access or our Roster.

COOKIES

We use cookies to provide personalised information through our digital platforms. We also use cookies to better target our advertising to you, both through our digital platforms and other platforms you may visit. We store these cookies for a maximum of 180 days.

You can set your browser to refuse all or some browser cookies but please note that some parts of our platforms may

become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason. We may without your knowledge or consent, process your data for a further purpose but only if the further purpose is compatible with the original reason for why we collected your data. If you would like an explanation of how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with certain parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal third parties including other companies within the First Access group (outside of the EU) and any consultants we engage to support our business activities or the activities of our Roster.
- External third parties including IT and security services, professional advisors, digital service providers to distribute our Roster's music, service providers to fulfil merchandise orders and marketing, PR and plugging teams to promote our Roster.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We share your personal data within the First Access group and with external service providers. This will involve transferring your data outside the European Economic Area (**EEA**). We ensure your personal data is protected by requiring all our group companies and contractors to follow the same rules when processing your personal data.

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

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; and/or
- We will use specific contract provisions approved by the European Commission which give personal data the same protection it has in Europe.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Communications and Purchase data) for six years after they cease being customers for tax and audit purposes.

We will keep your Contact, Online Profile, Identity, Marketing and Communications data for a period of 6 years after the relevant act on our Roster stops being active.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [Contact us](#)

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.