

PRIVACY POLICY

Introduction

Welcome to Raw Stadia's privacy policy. Raw Stadia respects your privacy and is committed to protecting your personal data. This privacy policy tells you how we look after your personal data when you visit our website, about your privacy rights and how the law protects you.

Please click through to the specific areas set out below. Use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. **[PURPOSE OF THIS POLICY AND WHO WE ARE]**

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1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Raw Stadia collects and processes your personal data. It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

Controller

Where Raw Stadia Limited (referred to as "Raw Stadia", "we", "us" or "our") is a data controller, it is responsible for your personal data. (In some cases, we are data processors for our clients, in which case we have different responsibilities.)

Contact details

If you have any questions about this privacy policy, please contact our data privacy manager at privacy@rawstadia.com

Changes to the privacy policy and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes name, username or similar identifier, title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, 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 this website.
- **Profile Data** includes your username and password, purchases made by you, your preferences and feedback.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal 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.

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 [and Financial Data] by communicating with us by phone, email or otherwise. This includes personal data you provide when you:
 - Enquire about our services;
 - Start to use our services;
 - request marketing to be sent to you; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties [and public sources] as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers [such as [Google] based outside the EU];
 - (b) advertising networks [such as [Google AdSense] based [inside **OR** outside] the EU]; and
 - (c) search information providers [such as [Google] based [inside **OR** outside] the EU].
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as [PayPal or Stripe] based [inside **OR** outside] the EU].
 - Identity and Contact Data from publicly available sources [such as Companies House, LinkedIn, corporate websites and the Electoral Register based inside the EU].

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 the services we have been engaged by you to provide.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data (other than in relation to sending third party direct marketing communications to you via email). You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

Set out below is a description of all the ways we plan to use your personal data, and the legal basis we rely on to do that. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. If more than one ground is specified below, you may request details about the specific legal ground we are relying on to process your personal data.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To record your details as a new client | (a) Identity (b) Contact | Performance of a contract with you |
| To scope, deliver and support services and equipment we provide to you, including managing payments and collecting money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |
| 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 | (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 clients use our services) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile | Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy) |

| | | |
|---------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | (d) Usage (e) Marketing and Communications (f) Technical | |
| To use data analytics to improve our website, services, marketing, client relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need from our services and products.

You will receive marketing communications from us if you are a client or have requested information from us or purchased services from us 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 of Raw Stadia for marketing purposes

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

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, and that reason is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

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

- External Third Parties as set out in the [*Glossary*].

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 transfer certain data outside the European Economic Area (**EEA**) for the purpose of managing our business and performing our services.

Whenever we transfer 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.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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 clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

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:

- [\[Request access to your personal data\].](#)
- [\[Request correction of your personal data\].](#)
- [\[Request erasure of your personal data\].](#)
- [\[Object to processing of your personal data\].](#)
- [\[Request restriction of processing your personal data\].](#)
- [\[Request transfer of your personal data\].](#)
- [\[Right to withdraw consent\].](#)

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights).

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).

Time limit to respond

We try to respond to all legitimate requests within one month.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best services. We consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

- Service providers providing IT and system administration services.
- Consultants and subcontractors acting as data processors who provide services.
- Professional advisers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

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).

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms, or if we are processing your personal data for direct marketing purposes.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data if, for example, you want us to establish the data's accuracy.

Request the transfer of your personal data to you or to a third party. We will provide your personal data in a structured, commonly used, machine-readable format.

Withdraw consent at any time where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.