

PRIVACY POLICY

What is the purpose of this document?

This notice applies to you if we process your personal information and you are not an employee or worker of ours, a prospective candidate employee or worker nor an individual to whom we have provided a specific privacy notice. You may, for example, be an individual that works at a supplier or customer that we deal with, an attendee at one of our marketing events, a shareholder or a user of our website.

References to we, our or us in this privacy notice are to the Triple S Group (being Triple S Sports and Entertainment Group Limited) (**TSG**), and each of its direct and indirect subsidiaries, trading under the "Triple S Group" brand.

Details of our main trading entities are as follows:

- TRIPLE S SPORTS MANAGEMENT LIMITED registered number: 06800017 registered office: Great Oak Farm Offices, Mag Lane, Lymm, Cheshire, WA13 0TF
- TRIPLE S EVENTS LIMITED registered number: 06799530 registered office: Great Oak Farm Offices, Mag Lane, Lymm, Cheshire, WA13 0TF
- END TO END MEDIA LIMITED registered number: 06926058 registered office: Great Oak Farm Offices, Mag Lane, Lymm, Cheshire, WA13 0TF
- JULIE PERRY EVENTS LTD registered number: 07453232 registered office: Great Oak Farm Offices, Mag Lane, Lymm, Cheshire, WA13 0TF

What we collect and hold about you

As part of processing business information, we store details about you as our client and as such we need to hold certain details in order to facilitate business with you. We keep the information we hold as limited as we can, but in some circumstances, we cannot facilitate business with you without it. We request and hold such information as:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin emergency contact information.

- National Insurance number.
- Bank account details and tax status information.
- Copy of driving licence.
- Copy of passport.
- Photographs.
- Your communications with us (be that by voice, text, in writing or via email).

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.
- Information about criminal convictions and offences.

We regularly review the types and detail of information we require, and when information is no longer necessary then it is appropriately disposed of.

How we use information about you

You might wonder how we intend to use the information we hold. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 1. Where we need to perform the contract, we have entered into with you.
- 2. Where we need to comply with a legal obligation.
- 3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

- 1. Where we need to protect your interests (or someone else's interests).
- 2. Where it is needed in the public interest or for official purposes.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Change of purpose

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

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions

Lawful Basis

Contracts with us

If you are supplied with a representation agreement with TSG we are using a contractual basis for processing your data. We require certain information about you and we may need to share that with select parties to ensure that we give you the best service.

How we share that information

As part of providing a service to you, it is necessary that we share some limited information with select parties. TSG takes measures to protect you and your identity, but nevertheless some information sharing is required. When this happens, the information we hold is only ever shared in a secure and confidential way.

There may also be a time when we need to share your information with government and law enforcement agencies. This is so that we comply with UK local and national law. Due care will be taken to assess law enforcement requests on a case by case basis to ensure that any request for information is legal, is not spurious in nature and relates to a specific need.

How long we keep that information

While you are a client of ours we will need to keep the data we gather about you for a period of time as is necessary to provide you with the service you require.

This also means that after you leave us we may keep certain information about you for a reasonable period of time or unless you have specifically instructed us to take alternate action via a written request.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your rights in connection with personal information

Right of Rectification

The information we hold about you we will keep up to date and accurate, and we may need to confirm this with you when you make contact with us. Any new information you give us will then update our records. You can also contact us to verify if the details we hold about you are correct.

Right to Erasure ("Right to be forgotten")

You have the right to request that the information we hold about you is removed and deleted. Although your details are automatically removed from our systems periodically when there is no longer a basis to hold them you can make a request verbally to us or in writing asking us to remove your details from our systems. The right to be forgotten

depends on a number of factors and is not absolute, however we will strongly consider any request before responding to you within 30 days of notifying us.

Right to Restrict Processing

You can ask us to place a restriction on your data being processed by our systems. Under this request we can still hold data about you but not use it. You can use this in conjunction with your right of rectification if the details we hold about you are incorrect. It can apply until those details are rectified before continuing to process your data.

Right to Data Transfer

As a client of ours we have to store certain details about you. You have the right to request the transfer of your personal information to another party. We will respond to your request for a data transfer within one month of the request being made, though this may be extended up to two months if the request is particularly complicated. If we do extend it to two months you'll be informed why the extension is necessary.

Right to Object

You have the right to object to data processing based upon the grounds of your particular situation. We will consider any right to objecting from data processing but may override it where we have compelling grounds to do so. Your request will be considered and if your request is overridden you will be informed as to the reasons why.

Subject Access Request

You as the data subject have the right to request information that we hold about you, this is called a Subject Access Request (SAR). You can ask a number of things about the information we hold about you and why. If you are unsure as to what a Subject Access Request is, or for examples on requesting that information please see the Information Commissioners Office (https://ico.org.uk/) for guidance on such requests.

Subject Access Requests should be made by email and addressed to the data privacy manager who you can email at info@tripleSsportsentertainement.com, alternatively you can write to us at our registered address.

The data controller will aim to provide the relevant data within 1 month from the date all relevant information relating to the request has been received. This can be extended to 2 months if the request is complex or if we receive multiple requests. You will be notified of this action. The data controller will always verify the identity of anyone making a subject access request before handing over any information.

No fee usually required

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

Your information protection

We take your personal data very seriously and as such we have measures in place to ensure its security and protection. These measures are reviewed and updated on a regular basis to protect you and the business.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data privacy manager

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

How to contact us

If you have any questions about this privacy notice, you can contact us via phone on 0845 521 2555, email us at <u>info@triplesgroup.com</u> or write to us at:

Data Privacy Manager, Triple S Sports and Entertainment Group Limited, Great Oak Farm Offices, Mag Lane, Lymm, Cheshire, WA13 0TF