

# Privacy notice to Attendees of First Names Group Events

## 1. INTRODUCTION

This privacy notice aims to give you information on how First Names Management Limited has collected and will process the following categories of personal data about you:

- any photographs taken at any event organised by us to which you have been invited or attend on behalf of another invitee “**the Photographs**”; and
- related contact details (specifically, your name, address, email address, telephone number, employer details and special dietary requirements) “**the Related Personal Data**”.

This privacy notice only relates to how we will process the Photographs and the Related Personal Data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, for example, if you are using our website, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## 2. IMPORTANT INFORMATION AND WHO WE ARE

### CONTROLLER

The First Names Group is made up of different legal entities all directly or indirectly owned by First Names Group Limited, a company registered in the island of Jersey. Details of the companies within the First Names Group can be obtained by writing to the Chief Risk Officer, whose details appear below. This privacy notice is issued on behalf of the First Names Group so when we mention “First Names Group”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the First Names Group responsible for processing your data.

Our Chief Risk Officer is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Chief Risk Officer using the details set out below.

### CONTACT DETAILS

Our full details are:

The Chief Risk Officer

Email address: [dataprotection@firstnames.com](mailto:dataprotection@firstnames.com)

Postal address: 2nd Floor, Gaspé House, 66-72 Esplanade, St. Helier, Jersey, JE1 1GH

You have the right to make a complaint at any time to the supervisory authority for data protection issues applicable in your circumstances (details of which can be obtained from the Chief Risk Officer). We would, however, appreciate the chance to deal with your concerns before you approach the authorities so please contact us in the first instance.

## 3. 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.

#### 4. THE DATA WE HAVE COLLECTED AND HOW IT WAS OBTAINED

We have collected the Related Personal Data and the Photographs will be collected at relevant events that you attend.

#### 5. HOW WE WILL USE YOUR PERSONAL DATA

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

- On the basis of your consent (if given);
- 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; and / or
- Where we need to comply with a legal or regulatory obligation.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. 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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.]

<b>Purpose of processing your data</b>	<b>Data</b>	<b>Lawful basis for processing including basis of legitimate interest (if applicable)</b>
Internal and external newsletters, social media accounts and website owned by us	Photograph	<ul style="list-style-type: none"><li>• Necessary for our legitimate interests (to inform our staff, clients and intermediaries about events which have taken place) which we undertake as part of our staff management and marketing activities to promote the interests of our business.</li></ul>
Managing our relationship with you, including: <ul style="list-style-type: none"><li>•Notifying you of changes to our privacy policy.</li><li>•Storing your contact details so that we can contact you.</li></ul>	[Photograph, Related Data]	<ul style="list-style-type: none"><li>• Necessary for our legitimate interests (to maintain a record of your contact details in case we need to contact you regarding the Photographs; to keep our records updated and / or to contact you with further invitations or marketing materials).</li></ul>

## **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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the Chief Risk Officer.

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.

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.

## **6. 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.

- Employees and consultants.
- External Third Parties who undertake marketing or IT work on our behalf.
- 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.

## **7. INTERNATIONAL TRANSFERS**

We share your personal data within the First Names Group. This will involve transferring your data outside the European Economic Area (EEA).

Some of our external third parties 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:

- Unless we are transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission 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.

## **8. 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.

## 9. DATA RETENTION

We will only retain the Photographs and Related Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal 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.

## 10. YOUR LEGAL RIGHTS

You have, in connection with your personal data, under certain circumstances, the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Withdraw consent at any time** in relation to our use of the Photograph for the Specified Purpose, in relation to which 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. 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 the Chief Risk Officer in writing.

If we receive notification that you have withdrawn your consent to the use of the Photographs, we will no longer process the Photographs and, subject to our retention policy, we will dispose of the Photographs securely. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

## 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.

## **11. 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 service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

### **THIRD PARTIES**

#### **Internal Third Parties**

Other companies in the First Names Group acting as joint controllers or processors.

#### **External Third Parties**

- Service providers (acting as processors) who provide IT and system administration services.
- Professional advisers (acting as processors or joint controllers) including lawyers, marketing specialists and other professional advisers who provide professional services to us.