

Privacy Notice

Welcome to Roulette Media Limited's (Roulette Media Group) privacy notice.

Roulette Media Group respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

We are ROULETTE MEDIA LTD, registered in England and Wales, number 09099674, registered address The Landmark Centre, 129 High Street, Deal, Kent CT14 6BB. Our Data Protection Lead can be contacted at dataprotection@roulettemedia.uk. We have produced this privacy notice in order to keep you informed of how we handle your personal data. All handling of your personal data is done in compliance with the General Data Protection Regulation (EU) 2016/679 ("Data Protection Legislation"). The terms "Personal Data", "Special Categories of Personal Data", "Personal Data Breach", "Data Protection Officer", "Data Controller", "Data Processor", "Data Subject" and "process" (in the context of usage of Personal Data) shall have the meanings given to them in the Data Protection Legislation. "Data Protection Lead" is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer.

What are your rights?

When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- The right to be informed of how your Personal Data is used (through this notice);
- The right to access any personal data held about you;
- The right to withdraw consent at any time, by opting-out using the options present in communications;
- The right to rectify any inaccurate or incomplete personal data held about you;
- The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy;
- The right to prevent processing for direct marketing purposes, scientific/historical research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and
- The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

You can exercise your right to access personal data by emailing dataprotection@roulettemedia.uk with the subject line: "**Subject Access Request**". When you submit a 'subject access request', you will need to provide confirmation of your identity by contacting us using the email address associated with your profile or attaching a photocopy of your driver's license or passport. This is provided free of charge and our response will be made within thirty (30) days unless our Data Protection Lead deems your request as being excessive or unfounded. If this is the case, we will inform you of our reasonable administration costs in advance and/or

any associated delays, giving you the opportunity to choose whether you would like to pursue your request. If you believe we have made a mistake in evaluating your request, please see the section 'Who can you complain to?'

If you have questions about any of the rights mentioned in this section, please contact our Data Protection Lead at dataprotection@roulettemedia.uk.

Who is the Data Controller?

- If your data has been passed to us by a third party for processing under their instruction, that third party is the Data Controller. They should have notified you that they would be passing your personal data to us, ROULETTE MEDIA LTD, at the time they collected your data and within their own privacy notices/standards.
- Where we collect your personal data for fulfilling purchases from one of our stores, we are the Data Controller.
- If we have received your personal data as part of a direct administrative relationship between our business and yours, we are the Data Controller.

What is our lawful basis for processing personal data?

Under Data Protection Legislation, there must be a 'lawful basis' for the use of personal data. The lawful basis criteria are outlined in Article 6, Section 1 of the GDPR. They are sub-sections:

1. 'your consent';
2. 'performance of a contract';
3. 'compliance with a legal obligation';
4. 'protection of your, or another's vital interests';
5. 'public interest/official authority'; and
6. 'our legitimate interests'.

What are ROULETTE MEDIA LTDs 'legitimate interests'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's personal data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of us processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest. If you would like to find out more about our legitimate interests, please contact Dataprotection@roulettemedia.uk.

About our processing of your data

We might collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

Identity Data such as names, usernames or similar; title.

Contact Data such as addresses; email addresses and telephone numbers.

Financial Data such as bank account and payment card information.

Transaction Data such as information about payments and details of purchases you have made.

Cookies A cookie is a small file containing a string of characters that is sent to your device when you use our site. When you use our Site a second time, the cookie allows our Site to recognize your device or browser. Some Site features may not function properly without cookies. We use cookies to understand how people use the Site and to improve content and services we offer through the Site. We may use cookies to track Site usage patterns and to record requests for subscriptions to our services. Our cookies may collect Personally Identifiable Information or aggregated, anonymized or de-identified information. Some features of the Site may not function properly without cookies.

Technical Data such as IP addresses; login data; browser info; time zone; location; browser plug-ins; operating systems; platforms and other technology on the device used to access this website.

Profile Data such as usernames; passwords; security answers; purchases/orders; interests; preferences; feedback and responses to surveys, blogs and messages.

Usage Data such as analytics relating to how you use the website.

Marketing and Communications Data such as your preferences about receiving communications from us or third parties.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data can be derived from your Personal Data but is not itself Personal Data as it cannot be used to reveal your identity. If Aggregated Data is ever used in combination with your Personal Data and becomes identifiable, it will be treated in accordance with this notice.

Reference	What categories of information about you do we process?	Why are we processing your data?	Where did we get your personal data from?
Music, Merch & Tickets	<ul style="list-style-type: none"> . Identity Data . Contact Data . Transaction Data 	<p>Whenever we sell you a product, such as music, merchandise or tickets, we use your personal data in order to manage your order, process payments and make sure that you receive your products. This processing is conducted lawfully on the basis of 'performance of a contract'.</p>	<p>Directly obtained at the point of sale.</p>
Fan Community Management (including sign-up mailing lists and forums)	<ul style="list-style-type: none"> . Identity Data . Contact Data . Profile Data . Technical Data . Marketing and Communications Data 	<p>If you join one of our fan communities, we will use your personal data to contact you with updates related to the subject of the mailing list or forums that you have subscribed to, as well as occasionally running competitions or other community events. These messages and websites might contain cookies, web-beacons, unique identifiers or similar to monitor our marketing distribution. This processing is conducted lawfully on the basis of 'your consent'.</p>	<p>Directly obtained when you sign-up.</p>
Direct Marketing	<ul style="list-style-type: none"> . Identity Data . Contact Data . Transaction Data . Technical Data . Marketing and Communications Data 	<p>If you are a current or previous customer - providing that you haven't opted-out before or since we collected your personal data - we may occasionally send you marketing related to the products that you purchased. These messages might contain, web-beacons, unique identifiers or similar to monitor our marketing</p>	<p>Directly obtained at the point of sale.</p>

		distribution. This processing is conducted lawfully on the basis of 'our legitimate interests'.	
		If you wish to contact us regarding an aspect of our service, including complaints or enforcing your consumer rights in relation to a product or service that we have sold	Directly
Customer Services	· Identity Data	you, we will use your personal data in order to investigate a claim, evaluate your needs and/or possibly take action, such as sending you a replacement product. This processing is conducted lawfully on the basis of 'compliance with a legal obligation'.	obtained at the point of sale, and at the time of enquiry (if applicable).
	· Contact Data		
	· Transaction Data		
		If you are an employee of one of our business partners, we may use your personal data to communicate with you and your business about achieving our respective business objectives. This processing is conducted lawfully on the basis of 'performance of a contract'.	Directly obtained from you or referred to us by one of yours or our partners.
B2B Relations	· Identity Data		
	· Contact Data		

What happens if I refuse to give ROULETTE MEDIA LTD my personal data?

If your personal data is used for selling you music, merchandise or tickets, your personal information has, in part, been collected as part of a statutory obligation arising under Companies Act 2006. Failure to process your data could result in us being unable to fulfil your orders.

If your personal data is used for observing your consumer rights, your personal information has been collected as part of a statutory obligation arising under Consumer Rights Act 2015. Failure to process your data could result in our inability to provide you with the remedies you are entitled to.

The information about you that we have collected for the performance of our contracts is required in order for us to successfully fulfil our obligations to you. If you choose not to provide the personal data requested, we will not be able to enter into a contract with you to provide the services we offer. If we are already processing your personal information under a contract, you must end our contractual relationship (as/where permitted) in order to exercise some of your rights. We process some personal information as part of a contractual relationship with a Data Controller. Any requests to restrict this type of processing should be forwarded to the Data

Controller; they will be responsible for discussing your concerns and making any decisions.

What profiling or automated decision making does ROULETTE MEDIA LTD perform?

ROULETTE MEDIA LTD does not perform any profiling or automated decision making based on your personal data.

How long will your personal data be kept?

ROULETTE MEDIA LTD holds different categories of personal data for different periods of time. Wherever possible, we will endeavour to minimise the amount of personal data that we hold and the length of time for which it is held.

- If 'consent' is the basis for our lawful processing of your data, we will retain your data so long as both the purpose for which it was collected, and your consent, are still valid. For mailing lists and forums, we will consider your consent as valid so long as you continue to receive our emails or login to our website forums. If your email address ceases to receive our messages (e.g. 'bounces-back'), we will consider this a withdrawal of consent. Occasionally, we might identify a legitimate interest in retaining some of your personal data that has been obtained by consent. If we do, we will inform you that we intend to retain it under these conditions and identify the interest specifically.
- If we process your data on the basis of 'legitimate interests', we will retain your data for as long as the purpose for which it is processed remains active. We review the status of our legitimate interests every twelve (12) months and will update this notice whenever we determine that either a legitimate interest no longer exists or that a new one has been found.
- All categories of personal data that are held by us because they are essential for the performance of a contract, will be held for a period of six years, as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.

Who else will receive your personal data?

ROULETTE MEDIA LTD passes your data to the third parties listed in the section 'Third Party Interests' below.

Third Party Interests

Data Controllers

Name or Category of Third Party Controller	What processing are we performing for them?	If applicable - who is their representative within the EU?
Website owners, including independent artists and record labels	Website, music, merchandising and ticket management.	N/A for European based owners – please contact dataprotection@roulettemedia.uk if you would like to find out about a specific representative.
HMRC, regulatory authorities or other authorities	We are joint Controller with these authorities who require reporting of processing in some situations.	N/A
Postal/courier providers	Where these providers act as Data Controller, we are joint Controller with them for the purposes of order fulfilment.	N/A
Payment Processors with whom you already have a relationship, such as PayPal	We are joint Controller with these service providers who simply pass payments you make through their services directly to us based on a transaction. These transactions are subject to the provider's privacy notices/policies.	N/A for European based services – please contact dataprotection@roulettemedia.uk if you would like to find out about a specific representative.

Our Data Processors

Name or Category of Third Party Processor	Purposes for carrying out processing	If applicable – where does data leaving the EEA go and what safeguards are in place?
Web hosting providers	Website hosting, including the storage of data forming the website content and processing your Technical Data (and Profile Data, where applicable) in order to provide you with access to our websites.	N/A
Internal technology providers	Office software providers, such as email clients. IT Support services, who might require access to our systems (with our strict supervision) in order to remedy faults with our technology.	N/A

Who can you complain to?

In addition to sending us your complaints directly to dataprotection@roulettemedia.uk, you can send complaints to our supervisory authority. As ROULETTE MEDIA LTD predominantly handle the personal data of UK nationals, our supervisory authority is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting <https://ico.org.uk/concerns/>.