#8 Sports Management Privacy Notice

This Privacy Notice explains the types of personal data we collect about you when you deal with us. It also explains what we do with that data, how we keep it safe, and your rights in relation to our processing of it.

For clarity, the following legal definitions apply.

Legitimate Interest
This means the conducting and managing of our business to enable #8 Sports Management to offer you the best service or product applicable to your potential, determined or actual needs. Using the data available, we carefully consider any decision and assess any potential impact and your rights before we process your personal data for our legitimate interests. You can obtain further information about how we assess our legitimate interests by contacting #8 Sports Management.

Contract legal basis
This 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.

About us
#8 Sports Management is a company registered in England with company number 07567772. If you have any questions regarding the way we process your personal data you can get in touch with our Data Protection Officer:

Data Protection Officer
#8 Sports Management
755 Fulham Road
London
SW6 5UU
Tel: 020 3432 7837

#8 Sports Management also trades under the following names

- Ultimate Tour (formally La Manga Sports Festival)
- The Serious Cricket T20 Festival
- Season Starter

There may be additional events which are either fully or part managed by #8 Sports Management to which this privacy notice also applies.

How we use your data
We are a tour operator and event manager and we process your personal data in order to:

- administer any enquiry you make about the holidays we sell.
- administer any holiday arrangements you book with us.
- ensure that our suppliers (e.g. resorts, transfer providers, etc) are able to provide the services that make up your holiday.
- contact you about the products we sell, which we hope will be of interest to you.

In the sections below we describe the ways in which we process your data, including:

- in each case, the 'lawful basis' on which we rely.
- which information about you we collect and how we use it.
- how long we keep it for and any rights you have to opt out of or object to the processing.

We may share your personal data with third parties. This could be through the sale or transfer of data or through the merger of two of more businesses through acquisition / sale. Any change of ownership may result in the new owners using your personal data in the same way as set out in this privacy notice.
Processing information when you make an enquiry

We collect some information about you if you make contact with us (via any communication method including, but not limited to, email, online form and telephone). In each case, we might ask you for your:

- Contact details including name, postal address, telephone number and email address.
- Any other additional information which will help us process your enquiry.

We will process your personal data so that we can provide you the information that you requested, and we rely on the contract lawful basis when we perform this processing.

If you provide us with contact details (e.g. an email address), we may use those details in order to send you information about similar holidays which we believe may be of interest to you. At the point we collect your contact details (email address, telephone number or postal address) we will ask you if you consent to us collecting your data. When we process and collect data in this way in order to send future marketing materials, we are doing so under the lawful basis called 'legitimate interests'.

If you choose to receive these materials, you can tell us to stop sending them at any point in the future, either by clicking an unsubscribe link in an email or by calling us directly on 020 3432 7837.

Processing information when you make a booking

On the agreement of a booking, we may ask for additional personal data so that we or our suppliers can fulfil obligations to you. For example, this additional data could include dietary requirements or dress size to ensure we deliver the best possible experience for you. We will only ask for details that are necessary in order to fulfil your holiday. Additionally, we ask you to make sure that all other members of your party are happy for us to process your details on the same basis as your own.

When we confirm your booking, you are made aware of all the companies involved in delivering the services you have requested and we will provide them with the necessary details to fulfil their obligations to you. For example, if you book a hotel, we will make sure that they are aware of your name, the date you are arriving, and how long you will stay.

We never give our suppliers personal data unless it is absolutely necessary to provide the services you have requested and never give them permission to use the data for their marketing purposes. However, they may independently ask if you are happy for them to use your personal data. Please note that both we and our suppliers of travel services act as data controllers when you book with us.

Between the time you book with us and the time you travel we may need to contact you directly about your booking using the details you have given us. For example, we might email you in order to request that you pay your balance or ask you to confirm the final number of guests in your party.

We rely on the contract legal basis for all of the processing we perform in order to provide the services you have booked with us.

Processing information from a telephone call

When you call our offices or mobile telephones, our systems automatically record the number you called us from and how long you spoke to us for. We process this information under our legitimate interests in order to help us resolve complaints or disputes.

Processing information from an email

When you email us, we keep a record of the email to help us with the administration of your booking and to resolve any complaints or disputes. We rely on our legitimate interests for this processing.

Processing information when you visit our website(s)

We do not currently keep records or details of your website visits such as the IP address, pages viewed or browser information.

However, we may use Google Analytics and other third party software such as Mailchimp in order to analyse how our visitors use our websites, and to measure the effectiveness of our marketing on the Internet. This information is only ever processed in aggregate, and we never link it back to any personal identifier.

All the processing described in the preceding paragraphs of this section relies on the legitimate interests lawful basis.
Processing data rights

The General Data Protection Regulation (GDPR) gives you rights regarding the way we process your information as follows:

- **Right to be informed:** We inform you about the ways in which we process your personal data both here and in specific messages you will see on our websites when we record your data. If you have any questions about the way your data is processed you can contact us.
- **Right of access:** You have the right to access what information we hold about you but may need to confirm your identity or clarify your request before providing such data. Please contact us directly should you require a copy of your data.
- **Right to rectification:** If you believe any information we hold about you is inaccurate or incomplete, please contact us directly so we can make the necessary amendments.
- **Right to erasure and right to object:** If we are processing personal data purely for future marketing purposes, we will erase it immediately upon request. However, if you have made a previous or current booking with us, we may have to retain the information in order to comply with obligations imposed upon us by our insurers, suppliers or to fulfil legal requirements. Please contact us directly should you wish to have your data erased and we will immediately action or explain why this is not possible.
- **Right to restrict processing:** If you believe that you have grounds to request that we restrict our processing of your information, please contact us.
- **Right to data portability:** Subject to a satisfactory request, we will do our best to provide the information we hold about you in a transferable and readable format.
- **Rights related to automated decision making such as profiling:** We do not perform any automated decision making or profiling using the personal data that we process.

Third party data processors

We have agreements with third parties who process personal data for us in accordance with our instructions.

Google may process your personal data on our behalf as operator of Google Analytics and AdWords.

Mail Chimp provides our email marketing service.

If you believe there is any problem relating to the way we are processing your personal data, please contact us directly. If you are not satisfied with the way we have handled your query, you can contact the Information Commissioner's Office.

AUGUST 2018