

CBI VR Experiences Limited

Privacy Notice

CBI VR Experiences respects your privacy and is 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 or use our services and tell you about your privacy rights and how the law protects you.

We keep our privacy notice under regular review. This version was last updated on 21 July 2020. Historic versions can be obtained by contacting us.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how CBI VR Experiences Limited collects and processes your personal data through your use of our website and our virtual events platform (“**the Platform**”), including any data you may provide through this website or the Platform when you sign up for news, alerts, updates or offers from us, sign into the Platform to prepare for, take part in or review information in relation to one of our virtual events (“**Events**”), take part in a competition or correspond with us by electronic means, including contact forms on our website. It also includes statistical, analytical and behavioural information relating to your use of our website (including our use of “cookies”) and the Platform.

This website is not intended for children and we do not knowingly collect data relating to children.

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

Controller

CBI VR Experiences Limited (referred to as "**CBI**", "**we**", "**us**" or "**our**" in this privacy notice), a limited company incorporated in England and Wales under registered number 12559802 is the "data controller" under the Data Protection Act 2018 and the General Data Protection Regulation (EU 2016/679) ("**Data Protection Legislation**") of any personal data referred to in this notice, which means we are responsible for how your personal data is used or "processed".

We have appointed a data privacy manager who is responsible for dealing with personal data issues and ensuring our compliance with the Data Protection Legislation. If you have any questions about this privacy notice or wish to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: CBI VR EXPERIENCES LIMITED

Email address: info@cbipr.com

Postal address: Rowan Fields, Tanyard Lane, Chelwood Gate, East Sussex RH17 7LY

Telephone number: 01825 722941

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice 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 and the Platform 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. When you leave our website or work outside of our Platform, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

“Personal data” means any information about a living individual from which that person can be identified. It does not include information which has been altered so that the person’s identity can no longer be determined (“**anonymised**” data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together into the following categories:

- **“Identity Data”**: this may include any name, online username or similar identifier, marital status, title, date of birth and gender.
- **“Contact Data”**: this may include business/organisational or residential address, email address and telephone or fax numbers, and any online username which can be used to contact you.
- **“Financial Data”**: this may include bank account or payment card details with which you are associated, including details which are also associated with a business or organisation.
- **“Transaction Data”**: this may include details about payments to and from you or your organisation and details of services purchased from us.
- **“Technical Data”**: means, where you interact with us via our website or the Platform, any internet protocol (“**IP**”) address used by or assigned to you, 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 the website or Platform.
- **“Profile Data”**: this may include your username and password on the Platform, purchases or orders for services arranged by or for you, data and results which are inputted into, generated by or outputted from our Platform, together with any data we may obtain from time to time about your interests and preferences, including analytical data as to how you use the Platform, including your interactions with the Platform and with other users of the Platform, video and audio recordings, copies of text submitted by you, feedback and survey responses.
- **“Usage Data”** includes information about how you use and interact with our website, services and the Platform.
- **“Marketing and Communications Data”** includes your preferences in receiving marketing from us and your communication preferences, together with any information held by us in separate databases for electronic marketing of our services.

We may also collect, use and share for any purpose anonymised “**Aggregated Data**”, such as statistical or demographic data. This data will not directly or indirectly reveal your identity when anonymised. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of the Platform and may provide this aggregated data to other users and customers in relation to our Events.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data and will use it in accordance with this Privacy Notice and any other privacy information we've given you.

Unless you are an employee or contractor of CBI, we will 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 will we collect any information about criminal convictions and offences.

We do not knowingly collect data relating to children in the course of our work or via our Platform.

If you fail to provide personal data

Where we need to collect personal data (either by law or under the terms of a contract we have with you or your organisation) and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or your organisation. If this prevents us from providing a product or service to you or your organisation, we will notify you.

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, Profile, Marketing and Communications and Financial Data by filling in forms, using our Platform, providing us with business cards or similar contact information, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - enquire about our products or services;
 - create, use or modify logins to the Platform;
 - request marketing to be sent to you;
 - give us feedback or contact us;
 - apply for or subscribe to our products or services; or
 - enter a competition, promotion or survey.
- **Automated technologies or interactions.** As you interact with our website and the Platform, we will automatically collect Technical, Profile, Usage and Identity Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, analytics tools built into the Platform and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. 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:
 - a. Technical Data from the following parties:
 - i. analytics providers based outside the UK or EU;
 - ii. marketing and event management networks such as Campaign Monitor Mailchimp or Eventbrite, which may be based inside or outside the European Economic Area; and
 - iii. search information providers based inside or outside the UK or EU.
 - b. Contact, Financial and Transaction Data from providers of technical, payment and logistics services, who may be based inside or outside the UK or EU.
 - c. Identity and Contact Data from your employer, business or organisation, or from publicly available sources such as Companies House, your organisation’s website or other public resources.
 - d. Identity and Contact Data from data brokers or aggregators, including such as Cognism Limited based inside the EU.
 - e. Identity and Contact Data from publicly available sources such as Companies House, trade journals and publications, your organisation’s websites, social media accounts and publications and the Electoral Register, based inside or outside the UK or 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 contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party, including your employer or organisation) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Lawful bases for using your personal data

We may rely on a number of the “lawful bases” provided in data protection legislation in order to process your personal data. Some of these are set out below.

- a. **“Legitimate Interest”** means CBI’s interest in conducting and managing our business to enable us to give our clients the best services and experience. It may also mean the legitimate interests of a third party, such as your employer or an organisation you are connected with, or other participants and participant organisations involved in our Events, including their interest in receiving our products and services.

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 or those of your organisation. Where we rely on legitimate interests of CBI or another party to process your data, we do not do so where those interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities or notify us that you object to our use of your data by contacting us.

- b. **“Performance of Contract”** means processing your data where it is necessary for the performance of a contract to which you are personally a party, or to take steps at your request before entering into such a contract.
- c. **“Comply with a legal obligation”** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- d. **“Consent”** means your explicit, informed and freely-given consent to our use of your personal data. Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending direct marketing communications to you via email or text message. You always have the right to withdraw consent to marketing by contacting us.

Purposes for which we will use your personal data

We have set out below 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 rely on more than one lawful basis to process your personal data, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on, where more than one ground has been stated.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or your organisation as a new client or Event participant	(a) Identity (b) Contact	(a) Performance of a contract with you

	<p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary for our legitimate interests and those of your organisation (to take your organisation on as a client and initially configure your account on our Platform)</p>
<p>To plan, administer and deliver our services, including:</p> <p>(a) Managing payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Contacting you about content and contributions to Events involving you or your organisation</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Profile</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us) and those of your organisation (to receive our services and comply with its obligations to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Asking you to leave a review, take a survey or participate in an Event or part of an Event.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) and those of your organisation (to assist in business development, sales and networking)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business</p>

	(d) Profile	reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website and Platform content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences and to provide insights into Events for our clients, customers and other Event participants	(a) Technical (b) Usage (c) Profile	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) and those of third parties, including other Event participants (to provide insights into the effectiveness and utility of Events and to develop their products, services and business)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To manage our relationship with you as an employee or independent contractor of CBI	(a) Identity (b) Contact	(a) Necessary for the performance of a contract with you

	(c) Financial (d) Transaction (e) Usage (f) Profile (g) Marketing and Communications	(b) Necessary for our legitimate interests and yours (to administer our relationship with you or any company through which you provide services) (c) Necessary to comply with our legal obligations as employers, or for financial administration and reporting
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Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you or your organisation may want or need, or what may be of interest to you.

You may receive marketing communications from us if (a) you have requested information from us; (b) you have personally purchased services from us; or (c) you have asked us to provide you with information about our Events, other services, or updates on topics relevant to your business and professional interests; and in each case you have not subsequently 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 third party for marketing purposes.

Opting out

You can require us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, by configuring your account on the Platform, or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not prevent us from communicating with you about other matters.

Cookies

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 you may be unable to login to the Platform and that some parts of the Platform 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for a new 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 either required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- e. Your employer or any other person or organisation with whom you are associated who obtains services from us or enquires about our services;
- f. Third parties to whom we may choose to sell, transfer or merge all or parts of our business or all or part of its assets. Alternatively, we may seek to acquire other businesses or merge with them. If any such 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.
- g. Service providers, acting as data processors, based in the EEA and the United States, including the following:
 - vFairs LLC
 - White Light Limited
 - Amazon Web Services and its affiliates,
 - Microsoft Corporation and its affiliates, who provide marketing, business administration, IT and system administration services;
 - Cognism
 - LinkedIn Hacker
 - Campaign Monitor
 - Q2Q
 - Pragmatic Web,
 - Xero Limited
- h. Our professional advisers and those of clients and other third parties we work for, acting as processors or joint controllers, including solicitors, bankers, accountants, experts and expert witnesses, pension providers and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services.

- i. HM Revenue & Customs, regulators and other authorities, acting as processors, joint or independent controllers of personal data, based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third-party service providers who act as data processors for us 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.

Where we share your personal data with other data controllers, such as your employer, a regulator or an organisation with which you are associated, they will be legally responsible for how they use your data and for providing you with relevant privacy information.

6. International transfers

A number of service providers who process personal data for us are based or have operations outside the EEA, and their processing of your personal data according to their standard terms (or any specific contract we have with them) may 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:

- a. We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- b. Where we use certain service providers, we may use specific contracts approved by the European Commission which are deemed by the Commission to give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- c. Our marketing and communications service providers, as listed above, may transfer data they process for us to the USA and rely on the EU model contracts discussed above or other approved measures to provide adequate protection for your legal rights when they do so.
- d. We use cloud and hosted services provided by Microsoft Corporation (and its global affiliates). Microsoft relies on EU model contracts in respect of transfers of your data outside the EEA.
- e. The Platform is hosted and administered on our behalf by vFairs LLC, a limited liability corporation incorporated and regulated in the state of Delaware and with offices in the state of New York. vFairs will rely on the EU model contracts in relation to personal data of UK and EU citizens which is transferred to countries outside the UK/EEA for processing.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/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 reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of legal proceedings in which your data may be needed as evidence.

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, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data can be requested by contacting us.

By law, we must keep basic information about our clients (which may include Contact, Identity, Financial and Transaction Data on individuals associated with them) for at least six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see the section on “your legal rights” below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

You always have the right to object to our processing your personal data for direct marketing purposes. Under data protection law, you also have the right to:

- a. Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of some or all of the personal data we hold about you in order to check that we are lawfully processing it.
- b. 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.
- c. Request erasure of your personal data. This enables you to ask us to delete or remove personal data. However, we are only required to agree where there is no good legal reason for us to continue 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), where we have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be required to comply with your request of erasure if other legal obligations prevent us from doing so.
- d. Object to processing of your personal data where we are relying on our legitimate interest (or that of a third party) to use your data and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. While data protection law permits you to make an objection and requires us to give it due and proper consideration, it also permits us to disagree with you if we are satisfied that we have a good legal basis for continuing to use your data. It also does not permit you to require us to stop using your data where we have a legal obligation to do so.
- e. Request restriction of processing of your personal data. This enables you to ask us to *suspend* the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful, but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- f. Request the transfer of your personal data to you or to a third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- g. Withdraw your consent at any time, but only where we are relying on that consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. 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 us.

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 could 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 will usually request proof of identity via the following forms of ID:

- A good-quality, legible copy of your driving licence, passport or other government-issued photo ID;
- A supporting document consisting of correspondence to you at your own address from a utility, bank or government authority dated within the last three months (for example, a utility bill, bank/credit card statement; HMRC, council tax or other tax notice)
- A minimum of one piece of photographic ID listed above and a supporting document is required.

To ensure it is properly received and acted on, your request should be made to info@cbipr.com or by phoning 01825 722941 or in writing to the contact address set out in this privacy notice.

We may also contact you to ask you for further information in relation to your request to speed up our response or clarify what you are asking us for.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.